

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**RICHARD A. GORMAN,**

Plaintiff,

v.

**ILYA SHPETRIK, OLEG  
SHPETRIK, ANNA SHPETRIK,  
and MARK SHPETRIK,**

Defendants.

**: COMPLAINT AND DEMAND  
: FOR JURY TRIAL**

**: Case No.**

**COMPLAINT**

Plaintiff Richard A. Gorman, through his undersigned counsel, hereby demands judgment against Defendants Ilya Shpetrik, Oleg Shpetrik, Anna Shpetrik and Mark Shpetrik, for the reasons and amounts set forth below, and in support thereof avers as follows:

**PARTIES**

1. Plaintiff Richard A. Gorman (“Gorman”) is an adult individual and resident of Delaware County, Commonwealth of Pennsylvania.

2. Defendant Illya Shpetrik (“Shpetrik”), aka “Ilya Syanov,” “Ilya Bit,” “Ilya Putin,” “Ilya Putin (BLT),” “Ilya BLT,” “Ilya S,” “Illya S,” “S. Ilya,” and “Michael Anthony,” is an adult individual and citizen of Canada, currently residing at 33 Mogul Drive, North York, ON, Canada M2H 2M8.

3. Defendant Oleg Shpetrik (“Oleg”) is an adult individual and citizen of Canada, currently residing at 33 Mogul Drive, North York, ON, Canada M2H 2M8.

4. Defendant Anna Shpetrik (“Anna”) is an adult individual and citizen of Canada, currently residing at 33 Mogul Drive, North York, ON, Canada M2H 2M8.

5. Defendant Mark Shpetrik (“Mark”) is an adult individual and citizen of Canada, currently residing at 33 Mogul Drive, North York, ON, Canada M2H 2M8.

6. At all times relevant to this Complaint, Shpetrik, Oleg, Anna and Mark have all resided at 33 Mogul Drive, North York, ON, Canada M2H 2M8.

### **JURISDICTION AND VENUE**

7. This Court has subject matter jurisdiction over Gorman’s claims under 28 U.S.C. § 1332(a)(2), as the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and Gorman is a citizen of the United States of America and the Commonwealth of Pennsylvania, and Ilya Shpetrik, Oleg, Anna and Mark are all citizens of Canada.

8. This Court has specific personal jurisdiction over Ilya Shpetrik, Oleg, Anna and Mark because, as described more thoroughly herein, they had sufficient minimum contacts with the Commonwealth of Pennsylvania and with this District, this action arises out of these contacts, and exercising personal jurisdiction over them would be reasonable and comport with the requirements of due process.



9. Exercise of specific personal jurisdiction over Ilya Shpetrik, Oleg, Anna and Mark is proper in this Court under 42 Pa. C.S. § 5322(a)(4), as they have caused harm or tortious injury in the Commonwealth of Pennsylvania by acts outside of the Commonwealth.

10. Venue is proper in this District under 28 U.S.C. § 1391.

**FACTS COMMON TO ALL COUNTS**

11. On July 29, 2013, a website located at <performoutsider.com> published an article titled “*Richard Gorman aka directresponse.net Criminal Past*,” which included defamatory statements about Gorman. A copy of the article is attached to this pleading as Exhibit 1 and incorporated by reference.

12. The article falsely stated that Gorman had sexually assaulted a minor.

13. In addition, the article linked to and incorporated by reference a website located at <http://anonnews.org/forum/post/8233> (the “AnonNews website”).

14. The AnonNews website included postings falsely stating that Gorman is a child molester and a pedophile. A copy of the AnonNews website postings are attached to this pleading as Exhibit 2 and incorporated by reference.

15. The defamatory statements in the <performoutsider.com> article and on the AnonNews website were available to everyone everywhere on the World Wide Web.

16. A Whois database search for the <performoutsider.com> domain name identified “Ilya Syanov” as the registrant, with an address at 43 Billington Crescent, Toronto, ON, Canada M3A 2G8. A copy of the Whois database search is attached to this pleading as Exhibit 3 and incorporated by reference.

17. The contact information the registrant provided the registrar for the <performoutsider.com> domain name was false.

18. Specifically, Barbara-Ann Young, the owner of the home at 43 Billington Crescent, Toronto, ON, Canada M3A 2G8, had never heard of “Ilya Syanov,” <performoutsider.com>, or Gorman. An email from Ms. Young, dated February 14, 2014 to abuse@godaddy.com is attached to this pleading as Exhibit 4 and incorporated by reference.

19. The false contact information was provided to conceal the identity of the person/persons that owned and operated the <performoutsider.com> website and published the defamatory statements about Gorman.

20. Under federal law, providing false contact information to a registrar when registering a domain name is evidence of the registrant’s bad faith. *See* 15 U.S.C. 1125(d)(1)(B)(i)(VII).

21. On December 10, 2013, Gorman received an email from a person/persons using the name “Rick Rollinski.” A copy of the December 10, 2013 email is attached to this pleading as Exhibit 5 and incorporated by reference.



22. The email threatened to “ruin [Gorman’s] personal life and [Gorman’s] professional life” unless he sent half-a-million dollars in bitcoin, a “cryptocurrency,” to an anonymous bitcoin address. *See*, Ex. 5.

23. On December 12, 2013, “Rick Rollinski” sent two additional emails to Gorman which are attached to this pleading as Exhibits 6 and 7, respectively, and incorporated by reference.

24. The December 12, 2013 emails repeated the threats, stating: “Better make with some coin Gor my man, im sure shits gonna start looking bad in short order.”

25. Gorman refused to pay the blackmail.

26. Shortly after, a Twitter account operating under the name “@performoutsider” – the same name as the one used in the <performoutsider.com> domain name – began publishing defamatory statements about Gorman to Gorman’s employees, clients, and vendors.

27. For example, on December 19, 2013, the person/persons controlling the @performoutsider Twitter account tweeted the following false and defamatory message to an employee at a company with which Gorman was affiliated: “How does it feel working for person who was convicted of sexual assault on a minor?”

28. Other false and defamatory posts include a posting directed to the CEO of a company with which Gorman was affiliated, calling the CEO a “child molester.”

29. After that, anytime the CEO's name was searched, the search engines would return the false and defamatory posting.

30. In addition, Gorman's customers began also began receiving threatening emails.

31. The emails stated that the customers would be exposed for working with Gorman's company, and attacked unless they paid a bitcoin ransom.

32. On January 24, 2014, Gorman sued the website located at <performoutsider.com>, as well as John C. Monarch (Monarch") and Karl F. Steinborn ("Steinborn"), for defamation in Pennsylvania state court.

33. A copy of the Pennsylvania state court complaint is attached to this pleading as Exhibit 8 and incorporated by reference.

34. On February 14, 2014, Monarch removed the Pennsylvania state court action to the United States District Court for the Eastern District of Pennsylvania.

35. Despite all efforts, the identity of the person/persons that owned and operated the <performoutsider.com> website could not be identified.

36. As alleged above, when registering the <performoutsider.com> domain name, the person/persons that did so provided the registrar with false contact information to conceal their identities.

37. Gorman thus filed a Motion with the Court to permit alternative service on "Ilya Syanov." [*Gorman v. Monarch*, No. 14-cv-00980 (E.D. Pa), ECF No. 18].



38. Monarch filed an Opposition to the Motion. A copy of Monarch's Opposition is attached to this pleading as Exhibit 9 and incorporated by reference.

39. In his Opposition, Monarch represented that he did "not know Ilya's true name, and ... does not have any other contact information for Ilya." *See*, Ex. 9 at 2, note 2.

40. Monarch's representation to the Court was untrue. *See infra* at ¶ 50.

41. Indeed, Daniel Robert Warner, the lawyer that represented Monarch in opposing Gorman's Motion, has since been disciplined by the State Bar of Arizona for submitting false affidavits and declarations to courts on behalf of his clients.

42. In any event, the Court denied Gorman's Motion, and dismissed the <performoutsider.com> website from the action without prejudice. A copy of the Court's May 21, 2014 Order is attached to this pleading as Exhibit 10 and incorporated by reference.

43. Monarch, on the other hand, challenged the Court's exercise of personal jurisdiction over him, and was voluntarily dismissed.

44. As for Steinborn, the Court found that he defamed Gorman, writing: "The allegations against [Gorman], that he was convicted of child molestation and is a proven pedophile are patently false, as is the scandalous allegation that his daughter was conceived as a result of a rape." A copy of the Court's May 20, 2015

Memorandum Opinion is attached to this pleading as Exhibit 11 and incorporated by reference. *See*, Ex. 11 at 2.

45. In addition, the Court awarded Gorman compensatory damages for his non-economic losses in the amount of \$3 million, writing:

[Gorman] was the target of a reprehensible campaign aimed at impugning his character with the specific purpose of harming his ability to conduct business and destroying his personal reputation. Mr. Gorman recounted in clear detail the emotional distress that he has suffered, and the lengths to which he has had to go to convince third parties that he has not committed the vile acts of which he has been accused. Of particular note, Mr. Gorman recounted how, as the scandal spread, the parents of his children's friends began to limit social contact and undermine his family life. It is difficult for me to conceive a worse accusation against a father than that of being a pedophile.

*Id.* at 2-3.

46. In the meantime, in August 2014, Gorman re-filed a lawsuit against Monarch for defamation and civil conspiracy, but this time in South Carolina state court.

47. The South Carolina state court action remains pending to this day.

48. On July 30, 2020, less than two months ago, Monarch produced "Supplemental Answers to Plaintiff's Interrogatories" in the South Carolina state court action. A copy of Monarch's "Supplemental Answers to Plaintiff's Interrogatories" is attached to this pleading as Exhibit 12 and incorporated by reference.



49. In Monarch's Supplemental Answer to Interrogatory No. 1, he identified "Ilya Syanov," one of the person/persons that owned and operated <performoutsider.com> website, as Ilya Shpetrik, with a residence at 33 Mogul Drive, North York, ON, Canada M2H 2M8. *See*, Ex. 12 at 4.

50. In Monarch's Supplemental Answer to Interrogatory No. 1, he further identified Ilya Shpetrik as also acting under the aliases "Ilya Putin," "Ilya Putin (BLT)," "Ilya BLT," "Ilya S," and "Ilya S." *Id.*

51. In Monarch's Supplemental Answer to Interrogatory No. 5, he identified Ilya Shpetrik as a person that owned, managed, and controlled the defamatory content published about Gorman on the <performoutsider.com> website, and at the @performoutsider Twitter account. *Id.* at 6-7.

52. On information and belief, Defendants Ilya Shpetrik, Oleg, Anna and Mark, combined together and with others in an effort to blackmail Gorman before Ilya Shpetrik, Oleg, Anna, Mark and others published the defamatory content about Gorman on the <performoutsider.com> website, and the @performoutsider Twitter account.

53. On information and belief, Ilya Shpetrik worked with or at the direction of John Monarch, who ran a business that was heavily promoted at the <performoutsider.com> website and competed with one of Gorman's businesses, to defame and blackmail Gorman.

**COUNT I - DEFAMATION**

54. Gorman restates and incorporates the averments set forth in the forgoing paragraphs as if stated fully herein.

55. As set forth above, Ilya Shpetrik, together with Oleg, Anna, Mark and others, maliciously, deliberately and recklessly published false and defamatory written statements about Gorman with the intent to injure Gorman and defame his personal reputation and business reputation.

56. The false and defamatory statements made by Defendants were and are untrue and were known by Defendants to be untrue with no basis in fact.

57. The false and defamatory statements made by Defendants were not privileged.

58. The recipients of the false and defamatory statements made by Defendants understood the defamatory meaning of such statements.

59. The recipients of the false and defamatory statements made by Defendants understood that such statements applied to Gorman.

60. The false and defamatory statements made by Defendants constitute defamation *per se*.

61. Defendants' actions were willful, wanton, reckless, and outrageous.

62. Defendants' false and defamatory statements were directed to Gorman in Pennsylvania.



63. Gorman has suffered and will continue suffering substantial and irreparable harm to his reputation as a result of Defendants' defamation.

64. Defendants' defamation is a direct and proximate cause of Gorman's damages.

65. Gorman is informed and believes he is entitled to judgment against Defendants, jointly and severally, for actual and punitive damages and for such other relief as this Court deems just and proper.

### **COUNT II – FALSE LIGHT**

66. Gorman restates and incorporates the averments set forth in the forgoing paragraphs as if stated fully herein.

67. As set forth above, Ilya Shpetrik, together with Oleg, Anna, Mark and others, maliciously, deliberately and recklessly publicized false and defamatory written statements that Gorman was a child molester and a pedophile on the <performoutsider.com> website, and at the @performoutsider Twitter account, with the intent to injure Gorman and smear his personal reputation and business reputation.

68. The Defendants intentionally disseminated these false allegations in a manner that would create a false impression in the mind of anyone reading them that Gorman was a child molester and a pedophile.

69. The public dissemination of Defendants' horrible allegations against Gorman would be highly offensive to a reasonable person and in fact were highly offensive to Gorman, causing him serious emotional distress.

70. The Defendants publicly disseminated these false allegations with actual knowledge of their falsehood and/or with reckless disregard to their truth or falsehood.

71. Gorman sustained serious humiliation, embarrassment, and emotional, physical, psychological, reputational, economic, and professional harm as a result of the Defendants' repeated public dissemination of falsehoods, intended to place him in a false light.

72. The Defendants' conduct was reckless and/or intentional and/or wanton and/or outrageous and they are therefore liable to Gorman for punitive damages.

### **COUNT III – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

73. Gorman restates and incorporates the averments set forth in the forgoing paragraphs as if stated fully herein.

74. The Defendants committed substantial and intentionally harmful acts against Gorman, as described above.

75. The Defendants maliciously, deliberately and recklessly publicized false and defamatory written statements that Gorman was a child molester and a pedophile on the <performoutsider.com> website, and at the @performoutsider Twitter account



– with the intent of harming Gorman’s reputation and causing him severe emotional distress.

76. The Defendants’ conduct, described in the preceding paragraphs, constitutes intentional infliction of emotional distress. They recklessly or intentionally caused severe emotional distress to Gorman by virtue of their extreme and outrageous conduct, described above, and this misconduct goes far beyond the bounds of common humane decency in a civilized society.

77. The Defendants’ harmful conduct was outrageous, willful, malicious, and intentionally designed to and actually did cause Gorman serious physical, emotional, economic, and professional distress and harm.

78. The Defendants’ conduct was reckless and/or intentional and/or wanton and/or outrageous and they are therefore liable to Gorman for punitive damages.

#### **COUNT IV – CIVIL CONSPIRACY**

79. Gorman restates and incorporates the averments set forth in the forgoing paragraphs as if stated fully herein.

80. On information and belief, Ilya Shpetrik combined with one or more persons, including, but not limited to, Defendants Oleg, Anna and Mark, in order to blackmail Gorman and then to carry out the threats in Ilya Shpetik’s blackmail emails.

81. Defendants' combination of activities was carried out for the purpose of injuring Gorman by causing harm to Gorman's business interests and reputation among the public – by defaming him, placing him in a false light, and causing him severe emotional distress.

82. On information and belief, Defendants committed acts in furtherance of this combination and conspiracy, including but not limited to Defendants' coordination with other persons, including but not limited to Monarch and Steinborn, in order to more widely disseminate the false and defamatory allegations that Gorman is a child molester and pedophile on the <performoutsider.com> website, the @performoutsider Twitter account, as well as other online platforms, using the World Wide Web.

83. Defendants' combination and conspiracy has caused special damages to Gorman's business interests and reputation, including but not limited to, the special harm caused by the augmented dissemination of the statements accomplished by virtue of the conspiracy. Moreover, Gorman has incurred additional special damages including, but not limited to, investigatory expenses and legal fees, loss of revenue to Gorman's business, mental anguish, and emotional suffering.

84. Gorman is informed and believes he is entitled to judgment against Defendants, jointly and severally, for actual and punitive damages and for such other relief as this Court deems just and proper.



### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Richard A. Gorman prays for judgement against the Defendants, jointly and severally, as follows:

- a. For judgement against Defendants for actual damages, including consequential and special damages;
- b. For judgment against Defendants for punitive damages;
- c. For judgement against Defendants for all applicable statutory penalties, reasonable attorney fees, and costs; and
- d. For such other and further relief the Court deems just and proper.

### **JURY TRIAL DEMANDED**

Plaintiff Richard A. Gorman respectfully demands a trial by jury on all claims and issues so triable.

Respectfully submitted,

**IPPOLITI LAW GROUP**

/s/ Patrick K. Gibson  
**PATRICK K. GIBSON, ESQ.**  
Attorney I.D. #315863  
1225 N. King Street, Suite 900  
Wilmington, DE 19801  
Ph.: (302) 428-1400  
Fax: (302) 428-9664  
patrick@ippolitilawgroup.com  
*Attorneys for Plaintiff*

Date: September 28, 2020





# **EXHIBIT 1**



- [Home](#)
- [Acquinity](#)
- [Adknowledge](#)
- [Adleverage](#)
- [Affiliate Venture Group](#)
- [Clickbooth](#)
- [Cpa Tank](#)
- [David Benson](#)
- [Directresponse.net](#)
- [EWA](#)
- [EWA Network](#)
- [Fireclick Media](#)
- [FTC](#)
- [Get Offers Direct](#)
- [Guardian Ads](#)
- [Jordan Sparks](#)
- [Leadcola](#)
- [Ndemand](#)
- [Pace Lattin](#)
- [Quickie Marketing](#)
- [Randoms](#)
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# Richard Gorman aka directresponse.net Criminal Past

Posted by [admin](#) on Jul 29, 2013 in [Directresponse.net](#) | [1 comment](#)

Richard Gorman owns a bunch of companies – [directresponse.net](#), [at cost fulfillment](#), [brand.com](#) etc and is pretty well known in the IM community.

However when you look at his criminal past you get this:

[Richard Andrew Gorman - Florida Sexual Offender 20130729-161450http://www.pameganslaw.state.pa.us/OffenderDetail.aspx?OffenderId=14784](#)  
[http://offender.fdle.state.fl.us/offender/flyer.do?personId=50706](#)  
[http://www.homefacts.com/offender-detail/PA14784/Richard-Gorman.html](#)

794.011(5) Commits Sexual Battery; Victim 12 Or Older And In Process Uses Physical Force Not Likely To Cause Serious Personal Injury

(5) A person who commits sexual battery upon a person 12 years of age or older, without that person's consent, and in the process thereof does not use physical force and



AffiliateSummit.com  
 http://zacjohnson.com/online-reputation-management-top-firms/  
 http://jumbleberry.com/contact/  
 http://www.total-apps.com  
 http://www.venable.com/todd-a-harrison/  
 http://www.itera.ru/isp/eng/  
 http://www.beckerortho.com/  
 http://www.adsdirect.com/  
 http://www.limelightcrm.com/blog/  
 http://sspr.com/  
 http://www.glacierpayments.com/  
 www.hershsandhoo.com  
 http://engagebdr.com/about-us/  
 Rich Gorman also brags about helping Kevan Barlow of the NFL 49ers, with a testimonial posted along with the NFL LOGO.

Here's some of the alleged stories of what allegedly happened:

Richard Gorman Jr. was no ordinary Florida State University undergraduate in 2003, the year he was arrested. He was flashy. He had money. He had co-founded an online nutritional-supplements company in Altamonte Springs.

On Jan. 15, 2003, a female student woke up in his Tallahassee apartment, not knowing how she got there.

The night before, she had been playing pool at a bar with Gorman and some of his fraternity brothers and blacked out, she would later tell authorities.

"I felt like I had been . . . raped," she would testify later. There was blood, she said, and she was sore.

She could not, however, swear that she had been assaulted.

Five months later, on June 21, 2003, another female student was found sobbing and screaming not far from Gorman's apartment.

Gorman had taken her home after a night of dancing and raped her, she told authorities. He was arrested a few hours later.

He went to trial in February 2005, charged with raping the woman who was found crying. Smith was the prosecutor. Jurors could not reach a verdict, however, and a judge declared a mistrial.

A few weeks later, Smith charged Gorman with rape in the earlier incident involving the woman who had blacked out.

On June 6, 2005, Smith put Gorman back on trial in the case that had ended without a verdict. Again, Gorman said he was innocent. This time, however, the jury found him guilty.

Before Gorman was sentenced, both sides negotiated a deal: Gorman would get five years in prison for the rape of which he had been found guilty. He also pleaded no contest to a lesser charge -- misdemeanor battery -- and got 30 days in the case of the woman who had passed out.

Gorman went to trial twice in Tallahassee. The first, in February 2005, ended with a hung jury. The second, in June 2005, went so badly for the prosecution that Chastity's lawyers offered Gorman a plea bargain the night before the verdict: 12 months probation, no prison.

But Gorman, his parents and attorneys were so convinced of a not-guilty verdict that they passed on the plea bargain. When the jury issued a guilty verdict, the judge ordered lawyers for both sides to come up with a new plea agreement less than the mandatory 8.9 years.

To his great regret, Gorman signed off on the agreement, which also included waivers prohibiting his seeking any post-conviction relief, including raising claims of ineffective counsel.

Thus, until Gorman is 37 years old, he will be on probation, possibly under curfew, and will have to live under sex offender restrictions until he's at least 47.

<http://anonnews.org/forum/post/8233>

her homework, she would have found that Gorman invited the underage victim to go out in a limousine with four other girls and provided plenty of booze.

He also stopped to pick up a \*\*\* and proceeded to a local bar. It was there that the victim became ill and asked to be taken home. Gorman volunteered to take her home but bypassed her dorm and took her to his house. Charged with rape - his second charge in a matter of months - Gorman's "first" story was that nothing happened.

When positive DNA results were returned, his firm denials changed to "it was consensual." Gorman has been successful in convincing a jury of one - Kathleen Parker - of his innocence. He was less successful with a six-person jury, which delivered a unanimous guilty verdict. Thankfully, the jurors considered all the evidence, not just one side.


Some other fun stuff:

<http://realitychatter.forumotions.net/t2093-bio-dad-is-a-convicted-so>

http://www.performoutsider.com/2013/07/29/richard-gorman-aka-directresponse-net-criminal-past/ Go SEP OCT DEC

45 captures 26 2012 2013 2018 About this capture

1 Aug 2013 - 18 Sep 2019



**Julie**  
Moderator

Posts: 25977  
Join date: 2009-10-14  
Location: at a yard sale in mount dora fl  
Mood: 😊

By Julie on Thu Mar 04, 2010 3:32 pm

Marinade Dave's has an interesting thread today, here is just part of it.

### The Irony

Before Sparkle was in her grave, her old boyfriend, Richard Andrew Gorman, Jr., swept into plucked little Alexis from the grasp of her grandparents and took her back to Pennsylvania. A natural father. Yes, he had every right to do that. She was gone before the funeral service. I might say, but perfectly legal because Gorman is closer to her than any living relative. As maternal grandparents wanted to keep her, they have no rights. However, that doesn't mean going to accept the situation. They plan on battling Gorman for custody rights.

"I'm going to fight him every day, and he's going to know that the law is on Lexi's side," her Kenneth Bacchus, said.

Why? You see, Richard Gorman is a convicted felon, but believe it or not, his conviction has his fitness as a father and the only way Lexi's grandparents would be able to get custody of authorities could prove he is abusing or neglecting her. That will be tough to do since she is away. Unfortunately, there's one more thing I need to tell you about **Gorman**. He is a **conv offender**. I think it's very important that all of you know this. Perhaps, it will give you a better law in Florida, because, like I've been saying all along, the law is very clear: grandparents have this state.

<http://marinadedave.wordpress.com/2010/03/04/the-irony/>

<http://my.opera.com/lounge/forums/findpost.pl?id=1561975>

*One of the most important functions of the Office of the State Attorney is to stand up for the victims of crime. It is in that vein that I must respond to a recent commentary by Kathleen Parker regarding the rape conviction of Rich Gorman ("Brief encounter ruined a young man's life," May 4).*

*Parker is the latest victim of Gorman's public-relations campaign, which employs the age-old defense tactic of blaming the victim. She talks about a 30-pound box of court documents that she apparently failed to review, and not once has she called this office for information. Had Parker done so, she would have found that the "regular college Joe" she describes actually ran an escort service and had a thriving computer business.*

*Had Parker done her homework, she would have found that Gorman invited the underage victim to go out in a limousine with four other girls and provided plenty of booze. He also stopped to pick up a stripper and proceeded to a local bar. It was there that the victim became ill and asked to be taken home. Gorman volunteered to take her home but bypassed her dorm and took her to his house. Charged with rape - his second charge in a matter of months - Gorman's "first" story was that nothing happened. When positive DNA results were returned, his firm denials changed to "it was consensual."*

*Gorman has been successful in convincing a jury of one - Kathleen Parker - of his innocence. He was less successful with a six-person jury, which delivered a unanimous guilty verdict. Thankfully, the jurors considered all the evidence, not just one side.*

WILLIAM N. MEGGS  
State Attorney



<http://www.performoutsider.com/2013/07/29/richard-gorman-aka-directresponse-net-criminal-past/>

Go

SEP OCT DEC

26

2012 2013 2018



About this capture

45 captures

1 Aug 2013 - 18 Sep 2019

Gorman apparently was/is cofounder/president of some company he created with a buddy.

"Some women say Gorman is a rapist, and police charged company computers were used to intimidate one of his alleged victims.

"While he was president, the company's computers were connected to an anonymous e-mail exposing the name of a rape victim, his rape victim, allegedly -- one of two women Gorman is charged with raping in Tallahassee," Pipitone said in the report.

One posting called the woman an HIV-infected drug user who had sex with more than 100 men, and another said she had been raped by her father.

Gorman was charged with witness tampering in Leon County, but the charges were dropped because the computers connected to the e-mail accounts were located in Orange County, at Oevau and at Seminole County at Gorman's parents' home, Local 6 News reported.

Gorman is supposed to be living at his parents' home while free on \$20,000 bond as he awaits trials on both rape charges, according to the report.

.....

Gorman, who has not been convicted of a crime, faces the first of two rape trials next month in Tallahassee. His first trial ended in a hung jury."

Type of Search: CRIMINAL

Scope: FELONY AND MISDEMEANOR

Jurisdiction: STATEWIDE

Arrest Date: 06/21/2003

Arresting Agency: TALLAHASSEE POLICE DEPARTMENT

SID Number: FL-05039972

Charge: SEX ASSAULT, VICTIM OVER 12 YEARS OF AGE, PHYSICAL FORCE - FELONY

Disposition: DISPOSITION NOT AVAILABLE THROUGH STATEWIDE REPORTING

The following information was found -

Name: RICHARD A. GORMAN

AKA: RICHARD GORMAN, RICHARD ANDREW GORMAN

DOB: MATCHES

SSN: MATCHES

Addr on File: 1551 EAGLES NEST CIR., WINTER PARK, FL

DL#: NA

Physical Desc.: WHITE MALE, HT 6'0, WT 194, BLACK HAIR, BROWN EYES, TATTOO

Arrest Date: 08/04/2004

Arresting Agency: ORLANDO REGIONAL OPERATIONS CENTER

SID Number: FL-05039972

Charge: COUNT 1 INVADE PRIVACY, MISUSE OF CONFIDENTIAL INFORMATION - MISDEMEANOR

COUNT 2 OBSTRUCTING JUSTICE, HARASS

WITNESS/VICTIM/INFORMANT - MISDEMEANOR

Disposition: COUNTS 1 AND 2 DISPOSITION NOT AVAILABLE THROUGH STATEWIDE REPORTING

The following information was found -

Name: RICHARD A. GORMAN

AKA: RICHARD GORMAN, RICHARD ANDREW GORMAN

DOB: MATCHES

SSN: MATCHES

Addr on File: 1551 EAGLES NEST CIR., WINTER PARK, FL

DL#: NA

Physical Desc.: WHITE MALE, HT 6'0, WT 194, BLACK HAIR, BROWN EYES, TATTOO

Arrest Date: 12/09/2004

Arresting Agency: LEON COUNTY SHERIFF'S OFFICE

SID Number: FL-05039972

Charge: SEX ASSAULT, VICTIM OVER 12 YEARS OF AGE, PHYSICAL FORCE FELONY

Disposition: DISPOSITION NOT AVAILABLE THROUGH STATEWIDE REPORTING

The following information was found -

Name: RICHARD A. GORMAN

AKA: RICHARD GORMAN, RICHARD ANDREW GORMAN

DOB: MATCHES

SSN: MATCHES

Addr on File: 1551 EAGLES NEST CIR., WINTER PARK, FL

<http://www.performoutsider.com/2013/07/29/richard-gorman-aka-directresponse-net-criminal-past/>

Go

SEP OCT DEC

26

2012 2013 2018



45 captures

1 Aug 2013 - 18 Sep 2019

About this capture

ps. nice photoshopped headquarters:

US & INTERNATIONAL FULFILLMENT

HEALTH & BEAUTY PRIVATE LABELING

RATES

COMPANY INFO

## COMPANY INFO

At Cost Fulfillment was founded in 2011 for Direct Response Marketers, by Direct Response Marketers.

We have 2 primary focuses here at At Cost Fulfillment:

1. High volume order fulfillment.
2. Private label health/beauty manufacturing.

At Cost Fulfillment ships to the US, Canada, Europe, Australia, and New Zealand.



About 166 results (0.21 seconds)



Image size:  
434 × 274

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All sizes - Small

Pages that include matching images

[Harrington Wyles](#)



[harringtonwyles.com/](http://harringtonwyles.com/)

383 × 376 - Helping Small Businesses Grow. Harrington Wyles is a Business Consultancy with a wealth of practical experience in small and medium businesses.

[SEAS Capital Partners, LLC](#)



[seascapitalpartners.com/](http://seascapitalpartners.com/)

580 × 256 - Our Philosophy. Today's business world is moving and changing fast. Customer demand, technical products, product design and application all combined with ...

[Baldwin House Insurance, Inc. - Nashville, Illinois](#)



[www.bhinsur.com/](http://www.bhinsur.com/)

300 × 199 - An Independent Insurance Agent based in Nashville, Illinois, serving personal, commercial and farming customers.

## 1 Comment



1. [Jeff](#) Aug05

Another great post bro. I was sick of Rich Gorman's non-stop chest pounding about how great he is and how everything he touches turns to gold. It doesn't take much research to see his "businesses" are shit, and now this on top of it is icing on the cake.

It's also no wonder he pushes his reputation management company so hard. He'll need it to clean up this mess.

[Reply](#)

## Leave a Reply

Your email address will not be published. Required fields are marked \*

Name \*

Email \*



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SEP OCT DEC

26

2012 2013 2018



45 captures

1 Aug 2013 - 18 Sep 2019

About this capture

Comment

You may use these [HTML](#) tags and attributes: <a href="" title=""> <abbr title=""> <acronym title=""> <b> <blockquote cite=""> <cite> <code> <del> <datetime=""> <em> <i> <q cite=""> <strike> <strong>

Submit Comment

Designed by [Elegant Themes](#) | Powered by [Wickedfire](#)

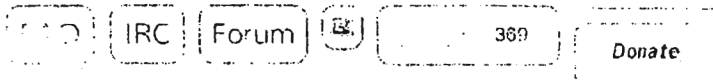
# **EXHIBIT 2**



Important information about the future of AnonNews.org: [Please click here to read.](#)

## AnonNews - Everything Anonymous

AnonNews 2.0 is finally there! Press release submission is open again, as are comments - and we now have forums! Other interface languages and language/tag filtering coming soon, as well as RSS feeds.



AnonNews is an independent and uncensored (but moderated) news platform for Anonymous. Anyone is welcome to post a submission, and can do so by clicking the "Add" button for a category. If you need help or have questions regarding AnonNews, please [join our IRC channel](#).

### Forum > Internet & Media > Internet pedophile

Anonymous

October 17, 2012  
10:50:23

[Report spam](#)

I've been tracking an internet pedophile now for a couple of months, but I don't have the know-how (tracing ip, hacking in computers) to get to his true identity. He is a sick fuck and needs to be dealt with. Does someone have an idea how to deal with such scum. Pedophiles are a real plague here in my country and I think we have to bring the fight to them.

sincerely,  
a great supporter of anonymous

Anonymous

October 17, 2012  
10:50:23

[Report spam](#)

i also am sick of this shit, i typed in "jailbait" in search (after hearing the term is used commonly by pedophiles on the news) and too many sites popped up, they need to be shut down and the people behind them held accountable!!!

Anonymous

January 20, 2013  
17:59:09

[Report spam](#)

Rich Gorman / ReputationChanger.com, DirectResponse.net & RichGorman.com Are hiding Child Molesters and Sex offenders!

There are pedophiles using reputation management or SEO tactics to hide online, making their registry the last thing you see associated to their name. Point in case is Mr. Rich Gorman, convicted sex offender, pedophile and rapist who uses reputationchanger.com, directresponse.net & all his other domains to hide himself and anyone who will pay him from showing up as a sex offender when a simple search is done on their names. Rich Gorman can be seen peddling his reputation changer packages or his richgorman.com at Affiliate Summit conferences, when in reality he is the rapist next door helping other rapist hide their sex offender status.

With Gorman's philosophy of hiding everything he has accomplished what every parent has nightmares about, hiding the National Registration and Local Sex Offender registry of all those charged and convicted of raping, assaulting or otherwise molesting a child. Both his companies started with Rich Gorman's <http://offender.fidle.state.fl.us/offender/flyer.do?personId=50706> own profile as a Sex offender, creating enough online garbage articles so as to create a ghost image of who he really is.

Rich Gorman raped a few girls in Florida, in fact he actually confessed and plead guilty to the offense due to all the victims willing to testify against him along with plenty of DNA evidence. He claims to have a Harvard or Yale education, which must have come at the hands of his cellmate, since the time he claims he attended school he was making sure to stay alive in a Florida prison system where Pedophiles are HATED!

I need HELP taking this asshole down, spreading the word to each and every client he has and

finally burying him like the piece of shit pedophile he is.  
 The only achievement RichGorman.com, DirectResponse.net or ReputationChanger.com have really accomplished is to endanger or hurt our children and families.  
 Check for yourself, here is a little experiment:  
 Google: Rich Gorman and see what comes up  
 Google: Rich Gorman Sex Offender see what comes up  
 Remember this is his real profile: <http://offender.fde.state.fl.us/offender/flyer.do?personId=50706>

Isn't it illegal to hide your crimes against children online?  
 794.011(5) Commits Sexual Battery; Victim 12 Or Older And in Process Uses Physical Force Not Likely To Cause Serious Personal Injury

I guess the fact that the victim was over 12 years old is the difference, that he didn't use force and instead got her drunk out of her mind or took her to his place to finish up makes a difference.

Shouldn't it at least be illegal to help OTHER PEDOPHILES do the same?

That is Rich Gorman

That is ReputationChanger.com

That is DirectResponse.net

Should we see the truth which keeps us safe:

<http://www.pomeganslaw.state.pa.us/OffenderDetail.aspx?OffenderId=14784>

<http://offender.fde.state.fl.us/offender/flyer.do?personId=50706>

<http://www.hornfacts.com/offender-detail/PA14784/Richard-Gorman.html>

& Let's not confuse the crime as Mr. Gorman would have you do, the specifics are:

794.011(5) Commits Sexual Battery; Victim 12 Or Older And In Process Uses Physical Force Not Likely To Cause Serious Personal Injury

(5) A person who commits sexual battery upon a person 12 years of age or older, without that person's consent, and in the process thereof does not use physical force and violence likely to cause serious personal injury commits a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, s. 775.084, or s. 794.0115.

So my question is simple, shall we allow this to continue?

William N. Meggs Florida State Attorney, the prosecuting attorney said of Rich Gorman:

One of the most important functions of the Office of the State Attorney is to stand up for the victims of crime. It is in that vein that I must respond to a recent commentary by Kathleen Parker regarding the rape conviction of Rich Gorman ("Brief encounter ruined a young man's life," May 4). Parker is the latest victim of Gorman's public-relations campaign, which employs the age-old defense tactic of blaming the victim. She talks about a 30-pound box of court documents that she apparently failed to review, and not once has she called this office for information. Had Parker done so, she would have found that the "regular college Joe" she describes actually ran an escort service and had a thriving computer business. Had Parker done her homework, she would have found that Gorman invited the underage victim to go out in a limousine with four other girls and provided plenty of booze.

He also stooped to pick up a \*\*\* and proceeded to a local bar. It was there that the victim became ill and asked to be taken home. Gorman volunteered to take her home but bypassed her dorm and took her to his house. Charged with rape - his second charge in a matter of months - Gorman's "first" story was that nothing happened.

When positive DNA results were returned, his firm denials changed to "it was consensual." Gorman has been successful in convincing a jury of one - Kathleen Parker - of his innocence. He was less successful with a six-person jury, which delivered a unanimous guilty verdict. Thankfully, the jurors considered all the evidence, not just one side.

WILLIAM N. MEGGS Florida State Attorney

Tell everyone you know, do what you can, expose this bastard for what he is!

Here are all the profiles he hides behind.

<https://plus.google.com/116923470231875564697>



AnonNews.org - Everything Anonymous

10/6/13 6:05 PM

[www.richgormansucks.net](http://www.richgormansucks.net) -  
[www.richgormansite.com](http://www.richgormansite.com)  
[www.directresponse.net](http://www.directresponse.net)  
[www.richgormanreputationchanger.org](http://www.richgormanreputationchanger.org)  
[www.richardgorman.com](http://www.richardgorman.com)  
[www.linkedin.com/pub/dir/Rich/Gorman](http://www.linkedin.com/pub/dir/Rich/Gorman)  
[www.crunchbase.com/person/rich-gorman](http://www.crunchbase.com/person/rich-gorman)

Here are the Affiliates that Mr. Gorman brags about doing business with, they all have Facebook pages so feel free to let them know how YOU feel about a rapist representing them.

AffiliateSummit.com  
<http://zacjohnson.com/online-reputation-management-top-firms/>  
<http://jumbleberry.com/contact/>  
<http://www.total-apps.com>  
<http://www.venable.com/todd-a-harrison/>  
<http://www.itera.ru/isp/eng/>  
<http://www.beckerortho.com/>  
<http://www.acsdirect.com/>  
<http://www.limelightcrm.com/blog/>  
<http://ssp.com/>  
<http://www.glacierpayments.com/>  
[www.hershsandhoo.com](http://www.hershsandhoo.com)  
<http://engagebdr.com/about-us/>  
 Rich Gorman also brags about helping Kevan Barlow of the NFL 49ers, with a testimonial posted along with the NFL LOGO.

Let's make this fucker run away from the internet like it was a case of burning super aids trying to crawl in his ass!!!!!!  
 BARRYTHEWONG

Anonymous

March 12, 2013  
 18:34:18

Report spam

Barrythewong? How do you know Rich Gorman?

Anonymous

March 31, 2013  
 22:37:55

Report spam

Just so you are aware, he probably DOES know Todd A Harrison. Todd is another pedophile with a giant web of his minions... Oh, wait, it's minyans with Todd. Todd owns Minyonville Media, Inc. His foundation is called the Ruby Peck Foundation. He runs minyonville.com and minyanland.com. Minyanland is SPECIFICALLY geared toward 8-12 year olds. Hmm... interesting that is the PRIME age for a PEDOPHILE. He's got such a huge empire with his company, he likely groorns his victims online and since he also has a MEDIA company, he can produce/distribute child porn to the masses. He "hides" behind his internet/business accomplishments, basically getting funding from reputable companies funding a child porn/child trafficking/child prostitution business in plain sight!

Anonymous

April 20, 2013  
 07:31:00

Report spam

A Formal Apology to Mr. Rich Gorman.  
 Summary: In the case of Chester County Court of Common Pleas at docket number 2011-11238

My name is Esteban Yaniz a/k/a Steven Yaniz and I have been found Liable & Responsible for posted content on websites, forums and comment exchange boards or consumer complaint forum websites as well as identified by a civil court as bearing the full and sole responsibility for said posts concerning Mr. Gorman and allegations of pedophilia; these post concerning Richard Gorman and any allegations of pedophilia or of him being a pedophile are completely false.

I have been found liable for these statements by the Courts because I made them & so have

been ordered to formally request the removal of existing postings found on any and all available websites immediately under any of these aliases.

The court has found me to be responsible & liable party for all comments made under the aliases of "Barrythewong" and Barnabas David Wong in reference to Mr. Gorman. The continued proliferation of these posts made by me under the aliases Steven Yaniz, Barnabas David Wong, "Barrythewong" or any others is completely false and should be treated as nothing but vile lies.

Mr. Gorman's accomplishments stand out for themselves and are not that of a Pedophile nor is it my place to further besmirch his name or reputation in any way and sincerely apologize for any harm I may have caused him emotionally, physically or economically. I was wrong for making these allegations and in my attempt to ruin Mr. Gorman's reputation as a renowned & accomplished entrepreneur.

The full case caption in which I have been found liable along with my financial liability for these statements is:

"Richard Gorman and Justin Singletary, Plaintiffs vs. Keisha Ruff and Esteban Yaniz o/k/a Steven Yaniz, Defendants." The case was presided over in the Chester County Court of Common Pleas at docket number 2011-11238.

Any information you may need as to the posts and said aliases can be found there. Per this available Court Order, I am notifying you of my request that you please remove the posted content from your website, to feel free to contact me via email with any further questions or with confirmation of the removal request.

(If your terms and conditions require me to physically provide a notarized copy of said court order along with any additional correspondence from myself including but not limited to an Affidavit if necessary.)

Esteban W. Yaniz  
Schoumburg, IL  
estebanwyaniz@gmail.com

Anonymous

May 31, 2013

Report spam

I was in court in 2012 when the Judge shamed Mr. Estaban W. Yaniz into admitting that he completely fabricated many despicable, libelous false statements about Mr. Richard Gorman. It is a documented fact that Mr Gorman was railroaded on a never happened crime solely due to prosecutorial misconduct -such misconduct was ADMITTED TO by the Florida Bar Board of Governors in July 2008. They took no action against the caught-cheating prosecutor (except for giving him a raise). I have personally known Richard Gorman for many years -- he is married and has 2 wonderful, brilliant children; his excellence as a business man is matched by his skills and attentiveness as a husband and a father.

Ignorant jealous people like Mr Yaniz are a great inspiration for the company known as ReputationChanger.com. Great things are ahead. Your friends know and love you Richard; just ignore the vermin and the liars and the haters--- they are not worth your time. Adam & John & Encreonex

Anonymous

July 8, 2013

The person above me is either working for Gorman or has been duped by his charisma. I don't know about pedophilia, but it's a well documented fact that he is a registered sex offender. When he started his work with Reputation Changer, back when Health Converter was alive, I was there next to him, helping him build his empire. On the one hand, I was duped. I also chose to overlook so many misdeeds. To anyone that I've hurt by working with this man, I sincerely apologize. I feared him. This man is evil. I won't go into details, as I'm not ever sure the wonderful people of Anonymous could help me. If him or any of his cronies are reading this, then he knows who this is. I'm not afraid of you, Rich Gorman.

AnonNews.org : Everything Anonymous

10/6/13 6:05 PM

Anonymous

July 8, 2013  
15:45:45

Report spam

^ provide proof, or fuck off.

"i typed in "jailbait" in search (after hearing the term is used commonly by pedophiles on the news) "

paedophiles NEVER say "jailbait" on the news. Lie most people on AnonNews who "protest" against child porn, you were most likely on the deep web searching for it for your own gratification.

Anonymous

July 8, 2013  
21:01:05

Report spam

Are you talking to me? Fuck, dude, I don't have that many claims except I worked for him.

Give me an email address, and I'll provide proof that I worked for him.

Anonymous

July 9, 2013  
05:50:31

Report spam

Ffs surely you have some arg. Like thegreymen to hunt that lot down

Anonymous

July 9, 2013  
06:30:52

Report spam

Meanwhile in actual reality, how have you allowed this to pass by unattended: University of Toronto, Professor Benjamin Levin.

"He is currently a tenured professor at the Ontario Institute for Studies in Education at the University of Toronto and is the Canada research chair in education leadership and policy."

"On Monday, Toronto police say, that multi-jurisdictional investigation culminated in the arrest of Benjamin Levin, a celebrated U of T education professor and highly regarded civil servant. The child pornography charges stunned colleagues in academic and political circles."

Jennifer Pogliaro - News reporter (jpogliaro@thestar.ca)  
Published on Monday July 8, 2013, The Toronto Star Online Edition.

Get busy. Or Snowden won't be the last fabricated man standing - Time is up, Expect that.  
(and ffs kill the misogyny already if you do actually believe in what your idea stands for...)

Anonymous

August 12, 2013  
01:32:53

Report spam

Most business owners are unaware that ReputationChanger.com is owned and operated by Rich Gorman, a sexual deviant who has been arrested twice for Sexual Battery.

The Florida State Attorney General's office prosecuted Rich Gorman of rape, of which he was convicted.

He has been trying to hide this fact for years, thus one of the reasons he puts out so much press, yet companies continue to hire this sexual deviant.

<https://plus.google.com/116923470231875564697>  
[www.richgorman.sucks.net](http://www.richgorman.sucks.net) -  
[www.richgorman.site.com](http://www.richgorman.site.com)  
[www.directresponse.net](http://www.directresponse.net)  
[www.richgorman.reputationchanger.org](http://www.richgorman.reputationchanger.org)  
[www.richardgorman.com](http://www.richardgorman.com)



AnonNews.org : Everything Anonymous

10/6/13 6:05 PM

www.linkedin.com/pub/dir/Rich/Gorman,  
www.crunchbase.com/person/rich-gorman

The company is run from Pennsylvania and it is not ok for Rich Gorman to rope and lead a perfectly normal life running of all things- a rep repair company.

Businesses that use Reputation Changer dot com should be ashamed! Protect Women

Anthony Hobb

August 27, 2013

10:05:38

: Report spam

RICHGORMANREPUTATIONCHANGER.ORG - Domain Informationnew  
Domain RICHGORMANREPUTATIONCHANGER.ORG | Site Info Traceroute RBL/DNSBL lookup!  
Registrar GoDaddy.com, LLC (R91-LROR)  
Whois server whois.publicinterestregistry.net  
Created 20-Nov-2012  
Updated 10-Apr-2013  
Expires 20-Nov-2013  
Time Left 93 days 20 hours 13 minutes  
Status CLIENT DELETE PROHIBITED CLIENT RENEW PROHIBITED CLIENT TRANSFER  
PROHIBITED CLIENT UPDATE PROHIBITED  
DNS servers BETH.NS.CLOUDFLARE.COM 204.93.173.10  
RAY.NS.CLOUDFLARE.COM RAY.NS.CLOUDFLARE.COM  
RICHGORMANREPUTATIONCHANGER.ORG - Geo Information  
IP Address  
198.211.106.88  
Host richgormanreputationchanger.org  
Location US US, United States  
City New York, NY 10012  
Organization ServerStack  
ISP Digital Ocean  
AS Number AS46652 ServerStack, Inc.  
Latitude 40°72'67" North  
Longitude 73°99'81" West  
Distance 7582.93 km (4711.81 miles)

Domain ID:D167159706-LROR  
Domain Name:RICHGORMANREPUTATIONCHANGER.ORG  
Created On:20-Nov-2012 14:30:35 UTC  
Last Updated On:10-Apr-2013 04:11:54 UTC  
Expiration Date:20-Nov-2013 14:30:35 UTC  
Sponsoring Registrar:GoDaddy.com, LLC (R91-LROR)  
Registrant ID:CR129548965  
Registrant Name:Richard Gorman  
Registrant Organization:Reputation Changer LLC  
Registrant Street1:39 West Gay Street  
Registrant Street2:  
Registrant Street3:  
Registrant City:West Chester  
Registrant State/Province:Pennsylvania  
Registrant Postal Code:31410  
Registrant Country:US  
Registrant Phone:+1.9127132398  
Registrant Phone Ext.:  
Registrant FAX:+1.6462246100  
Registrant FAX Ext.:  
Registrant Email:richard@reputationchanger.com  
Admin ID:CR129548967  
Admin Name:Richard Gorman  
Admin Organization:Reputation Changer LLC  
Admin Street1:39 West Gay Street  
Admin City:West Chester

AnonNews.org Everything Anonymous

10/6/13 6:05 PM

Admin State/Province:Pennsylvania  
 Admin Postal Code:31410  
 Admin Country:US  
 Admin Phone:+1.9127132398  
 Admin FAX:+1.6462246100  
 Admin Email:richard@reputationchanger.com  
 Tech ID:CR129548966  
 Tech Name:Richard Gorman  
 Tech Organization:Reputation Changer LLC  
 Tech Street1:39 West Gay Street  
 Tech Street2:  
 Tech Street3:  
 Tech City:West Chester  
 Tech State/Province:Pennsylvania  
 Tech Postal Code:31410  
 Tech Country:US  
 Tech Phone:+1.9127132398  
 Tech Phone Ext.:  
 Tech FAX:+1.6462246100  
 Tech FAX Ext.:  
 Tech Email:richard@reputationchanger.com  
 Name Server:RAY.NS.CLOUDFLARE.COM  
 Name Server:BETH.NS.CLOUDFLARE.COM

## Anonymous

September 1, 2013  
 02:24:35

Report spam

Ahh Rich Gorman...I chose not to turn him in over a crime he did a decade ago, while he still has a family, and two children. Hate to break something like that up.Lulz  
 As for his company RepChanger, I be going after his execs, especially his best friend who manages a good chunk of the company

<http://www.dinkypage.com/rich-richard-gorman>

<http://www.homefacts.com/.../Richard-Andrew-Gorman.html>

Work: Gorman Economics LLC

Goagle+:

<https://plus.google.com/116923470231875564697>

<https://plus.google.com/u/0/100799454927642821509>

Linkedin: <http://www.linkedin.com/profile/view...>

<http://www.linkedin.com/pub/rich-gorman/26/754/1b>

Youtube:

<http://www.youtube.com/user/RichGormanDRM>

[http://www.youtube.com/channel/UCBeo\\_uukd9jkuNxOVhFHDFw](http://www.youtube.com/channel/UCBeo_uukd9jkuNxOVhFHDFw)

Font: <http://pastebin.com/ZJjW067h>

Twitter:

<http://twitter.com/RichAGorman>

<https://twitter.com/RichGorman101>

Relative urls

<http://www.completed.com/individual/Rich-Gorman>

<http://richgorman.com>

[www.richgormansucks.net](http://www.richgormansucks.net)

<http://www.directresponseagency.net/>

[www.richgormansite.com](http://www.richgormansite.com)

[www.directresponse.net](http://www.directresponse.net)

[www.richgormanreputationchanger.org](http://www.richgormanreputationchanger.org)

<http://www.anonnews.org/forum/post/8233>

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Case ID: 140102501

AnonNews.org : Everything Anonymous

10/6/13 6:05 PM

<http://directresponse.net>  
[www.richardgorman.com](http://www.richardgorman.com)  
[www.crunchbase.com/person/rich-gorman](http://www.crunchbase.com/person/rich-gorman)  
<http://rich-gorman.net/>  
<http://richardgormanphiladelphia.com>  
<http://directresponse.net/rich-gormans-biz-op/>

Anonymous

September 8, 2013  
10:08:14

Report spam

Looks like this guy's fame for being a known sex offender is being found more and more often.  
 5 peers are taking him to task  
<http://www.performoutsider.com/2013/07/29/richard-gorman-aka-directresponse-net-criminal-post/>

Anonymous

September 9, 2013  
01:53:56

Report spam

flooded the servers, burned one for sure.  
 nice little sql injection provided courtesy of us.

Anonymous

September 11, 2013  
21:53:33

Report spam

<https://www.facebook.com/pages/Tips-from-a-Hacker/475251319233483>

Anonymous

September 12, 2013  
21:19:25

Report spam

Crush all rapists and pedos! > <

Anonymous

September 15, 2013  
02:17:44

Report spam

Type of Search: CRIMINAL  
 Scope: FELONY AND MISDEMEANOR  
 Jurisdiction: STATEWIDE

Arrest Date: 06/21/2003  
 Arresting Agency: TALLAHASSEE POLICE DEPARTMENT  
 SID Number: FL-05039972  
 Charge: SEX ASSAULT, VICTIM OVER 12 YEARS OF AGE,  
 PHYSICAL FORCE - FELONY  
 Disposition: DISPOSITION NOT AVAILABLE THROUGH STATEWIDE  
 REPORTING  
 The following information was found -  
 Name: RICHARD A. GORMAN  
 AKA: RICHARD GORMAN, RICHARD ANDREW GORMAN  
 COE: MATCHES  
 SSN: MATCHES  
 Address File: 1551 EAGLES NEST CIR., WINTER PARK, FL  
 DL#: NA  
 Physical Desc.: WHITE MALE HT 6'0. WT 194, BLACK HAIR, BROWN  
 EYES, TATTOO

Arrest Date: 08/04/2004  
 Arresting Agency: ORLANDO REGIONAL OPERATIONS CENTER  
 SID Number: FL-05039972

<http://anonnews.org/forum/post/8233>

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Case ID: 140102501



AnonNews.org Everything Anonymous

10/6/13 6:05 PM

Charge: COUNT 1 INVADE PRIVACY, MISUSE OF CONFIDENTIAL INFORMATION - MISDEMEANOR  
 COUNT 2 OBSTRUCTING JUSTICE, HARASS  
 WITNESS/VICTIM/INFORMANT - MISDEMEANOR  
 Disposition: COUNTS 1 AND 2 DISPOSITION NOT AVAILABLE THROUGH STATEWIDE REPORTING  
 The following information was found -  
 Name: RICHARD A. GORMAN  
 AKA: RICHARD GORMAN, RICHARD ANDREW GORMAN  
 DOB: MATCHES  
 SSN: MATCHES  
 Address File: 1551 EAGLES NEST CIR., WINTER PARK, FL  
 DL#: NA  
 Physical Desc.: WHITE MALE, HT 6'0, WT 194, BLACK HAIR, BROWN EYES, TATTOO

Arrest Date: 12/09/2004  
 Arresting Agency: LEON COUNTY SHERIFF'S OFFICE  
 SID Number: FL-05039972  
 Charge: SEX ASSAULT, VICTIM OVER 12 YEARS OF AGE, PHYSICAL FORCE FELONY  
 Disposition: DISPOSITION NOT AVAILABLE THROUGH STATEWIDE REPORTING  
 The following information was found -  
 Name: RICHARD A. GORMAN  
 AKA: RICHARD GORMAN, RICHARD ANDREW GORMAN  
 DOB: MATCHES  
 SSN: MATCHES  
 Address File: 1551 EAGLES NEST CIR., WINTER PARK, FL  
 DL#: NA  
 Physical Desc.: WHITE MALE, HT 6'0, WT 194, BLACK HAIR, BROWN EYES, TATTOO

Anonymous

September 15, 2013  
02:27:14

Report spam

They say the victim was over 12 but not an adult, so how can there be no harm in the rape and he's married w kids???

What fucking kind of wife marries a RAPIST like Richard Gorman and then has kids with him

Anonymous

September 17, 2013  
20:20:51

Report spam

I work for him. He's a cool dude. You weren't there so you can't act like you know everything about his past transgressions, or speak on his character. He fucked up yes, but he's not about that life now. He did his time so quit bashing him. It's people like you guys who make our company necessary. Bashing someone you don't know, for transgressions of his past. IF he was trying to HIDE these things he would have used our service to make forums like this, and the related search of "sex offender" stop showing up. Clearly he didn't. Therefore he is being transparent. All the information about his past crimes are there. Available for all to see. He's paying his dues, so leave the man alone.

Also no, I'm not mindfucked by his charisma since personally he's doesn't really talk to us too often since he's busy running a company. I'm speaking my own thoughts. I guess it helps that I'm buddhist and like to seem more than one side to people.

Anonymous

September 16, 2013  
09:56:57

Report spam

Apparently your Buddhist beliefs let you forgive someone for being accused of rape several times prior to being charged and convicted, or him ripping people off, or perhaps you are forgiving him for intimidating the witnesses of his case and destroying evidence on his Pcs as stated above; We Are Not Buddhists! Your "Cool Dude" has been thoroughly researched, his transgressions noted and his continued behavior registered quite clearly. He has mentioned his

dead wife as a drug addict, attacked his ex-inlaws openly online and on several boards where he refers to them as scam artists and pedophiles.

Since you work for him why not look him up FOR REAL? GET past that first page on Google results and put in some real time and effort with your query

Anonymous

September 18, 2013  
23:51

Report spam

Forgiveness is important in buddhism. I'm not going to rant about that since nobody other than me cares haha.

Some things I believe and other I do not. It's a bunch of things that random people posted on the internet. Again I wasn't there, nor were you (at least I assume so).

Things could have played out many ways but they all had the same ending he went to jail. He did his time. That's the end of it. He's living with his wife and children, and just "doing him". So I say let him be. He hasn't done any wrong to you, so why try to curse his name?

I say live and let be. Karma is a cruel mistress, so if all of the accusations are true he will suffer for them. If they aren't then good for him.

Not trying to cram buddhism on anyone but seriously, it helps make life a lot simpler, and more enjoyable (after you get past the initial thought of "life is suffering").

Anonymous

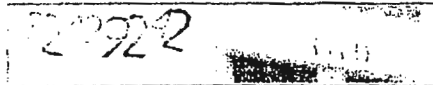
October 4, 2013  
22:32:46

Report spam

i cant believe you guys dnbbble on so much, i researched these jailbait sites 11, 765 times and found nothuing objectional

Post a reply

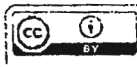
Anonymous



Post reply >>

Get another Captcha Get Audio Captcha Help Captcha by reCAPTCHA

1BZDeCvxBoUtRErmErlpA8odUxtPyttd (changed!)



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AnonNews.org · Everything Anonymous

10/6/13 6:05 PM



# **EXHIBIT 3**

United States - English

Currency: USD

24/7 Support (480) 505-8877

Sign In Register



All Products

Domains

Websites

Hosting &amp; SSL

NEW

Get Found

Email &amp; Tools

Support

WHOIS search results for:

**PERFORMOUTSIDER.COM**

(Registered)

Is this your  
domain?

Add hosting, email and more.

Want to buy  
this domain?

Get it with our Domain Buy service.

Domain Name: PERFORMOUTSIDER.COM  
 Registry Domain ID: 1742788686\_DOMAIN\_COM-VRSN  
 Registrar WHOIS Server: whois.godaddy.com  
 Registrar URL: http://www.godaddy.com  
 Update Date: 2013-09-06 07:28:41  
 Creation Date: 2012-09-05 03:40:09  
 Registrar Registration Expiration Date: 2014-09-05 03:40:09  
 Registrar: GoDaddy.com, LLC  
 Registrar IANA ID: 146  
 Registrar Abuse Contact Email: abuse@godaddy.com  
 Registrar Abuse Contact Phone: +1.480-624-2505  
 Domain Status: clientTransferProhibited  
 Domain Status: clientUpdateProhibited  
 Domain Status: clientRenewProhibited  
 Domain Status: clientDeleteProhibited  
 Registry Registrant ID:  
 Registrant Name: Ilya Syanov  
 Registrant Organization:  
 Registrant Street: 43 Billington Cres.  
 Registrant City: Toronto  
 Registrant State/Province: Ontario  
 Registrant Postal Code: M3A2G8  
 Registrant Country: Canada  
 Registrant Phone: +1.4162737596  
 Registrant Phone Ext:  
 Registrant Fax:  
 Registrant Fax Ext:  
 Registrant Email: jasonstateham@gmail.com  
 Registry Admin ID:  
 Admin Name: Ilya Syanov  
 Admin Organization:  
 Admin Street: 43 Billington Cres.  
 Admin City: Toronto  
 Admin State/Province: Ontario  
 Admin Postal Code: M3A2G8  
 Admin Country: Canada  
 Admin Phone: +1.4162737596  
 Admin Phone Ext:  
 Admin Fax:  
 Admin Fax Ext:  
 Admin Email: jasonstateham@gmail.com  
 Registry Tech ID:  
 Tech Name: Ilya Syanov  
 Tech Organization:  
 Tech Street: 43 Billington Cres.  
 Tech City: Toronto  
 Tech State/Province: Ontario  
 Tech Postal Code: M3A2G8  
 Tech Country: Canada  
 Tech Phone: +1.4162737596  
 Tech Phone Ext:  
 Tech Fax:  
 Tech Fax Ext:  
 Tech Email: jasonstateham@gmail.com  
 Name Server: NS1.PERFORMOUTSIDER.COM  
 Name Server: NS2.PERFORMOUTSIDER.COM  
 DNSSEC:  
 URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/  
 Last update of WHOIS database: 2014-5-14T14:00:00Z

The data contained in GoDaddy.com, LLC's WHOIS database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you.

## Domain already taken?

Enter Domain Name

.com

Search

## NameMatch Recommendations

GoDaddy.com NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand and enable you to capture more Web traffic, which you can then direct to your primary domain.

### Domains available for new registration:

#### Alternate TLDs

<input type="checkbox"/> performoutsider.info	SAVE!	\$2.99*/yr
<input type="checkbox"/> performoutsider.net	SAVE!	\$9.99*/yr
<input type="checkbox"/> performoutsider.org	SAVE!	\$12.99*/yr
<input type="checkbox"/> performoutsider.us	SAVE!	\$3.99*/yr
<input type="checkbox"/> performoutsider.biz	SAVE!	\$7.99*/yr
<input type="checkbox"/> performoutsider.mobi	SAVE!	\$9.99*/yr
<input type="checkbox"/> performoutsider.ca		\$12.99*/yr
<input type="checkbox"/> performoutsider.me	SAVE!	\$9.99*/yr

#### Similar Premium Domains

<input type="checkbox"/> DoPerformingArts.com	\$401.00*
<input type="checkbox"/> OhioPerformingArts.com	\$575.00*
<input type="checkbox"/> BostonPerformingArts.com	\$488.00*
<input type="checkbox"/> OutsiderNetwork.com	\$1,288.00*
<input type="checkbox"/> IsOutsider.com	\$1,888.00*
<input type="checkbox"/> PerpetualOutsider.com	\$1,588.00*

ADD TO CART

### Domains available at Go Daddy Auctions@:

<input type="checkbox"/> outsiderbrand.com	Ends on: 8/5/2014 9:33:00 AM PDT	\$15,000.00*
<input type="checkbox"/> marketperform.net	Ends on: 8/4/2014 5:58:00 PM PDT	\$788.00*
<input type="checkbox"/> performanceequipment.com	Ends on: 8/3/2014 4:18:00 PM PDT	\$688.00*
<input type="checkbox"/> performpower.com	Ends on: 8/1/2014 10:01:00 PM PDT	\$688.00*
<input type="checkbox"/> outsideronline.com	Ends on: 8/1/2014 8:46:00 AM PDT	\$1,688.00*
<input type="checkbox"/> performarts.com	Ends on: 7/31/2014 9:04:00 PM PDT	\$1,188.00*

ADD TO CART

## Whois Lookup | Domain Availability - Registration Information

Information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of GoDaddy.com, LLC. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" section. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

[See Underlying Registry Data](#)  
[Report Invalid Whois](#)

## Learn more about

[Private Registration](#)[Deluxe Registration](#)[Business Registration](#)[Protected Registration](#)

\*Plus ICANN fee of \$0.18 per domain name year.

\*\*CA domain names will be registered through Go Daddy Domains Canada, Inc., a CIRA certified registrar.

Search for another domain name in the **WHOIS** database

Enter a domain name to search

.com

Search

**NEED HELP?** Call our award-winning support team 24/7 at **(480) 505-8877**

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Email Address

Submit

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# **EXHIBIT 4**

Wednesday, May 14, 2014 at 10:52:51 AM Eastern Daylight Time

**Subject:** FW: URGENT: Please contact the undersigned  
**Date:** Saturday, February 15, 2014 at 1:57:24 PM Eastern Standard Time  
**From:** [REDACTED]  
**To:** [REDACTED]  
**CC:** [REDACTED]

FYI

John P. Wixted | Blank Rome LLP  
One Logan Square 130 North 18th Street | Philadelphia, PA 19103-6996  
Phone: 215.569.5649 | Fax: 215.632.5649 | Email: [JWixted@BlankRome.com](mailto:JWixted@BlankRome.com)

**From:** B [mailto:bay\_1991@hotmail.com]  
**Sent:** Friday, February 14, 2014 4:26 PM  
**To:** abuse@godaddy.com  
**Cc:** Wixted, John P.; B  
**Subject:** URGENT: Please contact the undersigned

Hello,

I would like to speak with someone regarding an abuse of the "godaddy.com" website.

Chronological order of events:

- On Tuesday, September 11th, 2014, I received a copy of an "Affidavit of Service" from the office of John P. Wixted, Esquire. Their office is located in Philadelphia, PA.
- On Wednesday, September 12th, 2014, I received a registered package which contained a "Civil Cover Sheet" from the Court of Common Pleas of Philadelphia County in regards to a court case of Gorman vs [www.performousider.com](http://www.performousider.com).
- I called and left a message for Mr. Wixted regarding the two documents that were sent to my home.
- On February 14th at 10:09 am I again called and left another message
- At 3:51 p.m. he kindly returned my call and left his contact information.
- At approximately 4:00 p.m. I returned his call. I explained that there must have been some error because I and my son don't know anybody associated with anybody listed in this complaint (either the plaintiff or defendant). He suggested that I contact your company regarding the fact that someone has used my home address here in Canada.

I need to speak to someone about the fact that my personal property, i.e., my home, has been used by someone and it is now "part of" this lawsuit.

I can be reached at home at 416-449-1213 or at work at 647-722-6641 ext 3440. My work hours are Monday - Friday, from 9:00 a.m. - 5:30 p.m. est.

I appreciate a call as soon as possible.

Regards,

Barbara-Ann Young

\*\*\*\*\*  
\*\*\*\*\*  
\*\*\*\*\*

This message and any attachments may contain confidential or privileged information and are only for the use of the intended recipient of this message. If you are not the intended recipient, please notify the sender by return email, and delete or destroy this and all copies of this message and all attachments. Any unauthorized disclosure, use, distribution, or reproduction of this message or any attachments is prohibited and may be unlawful.

\*\*\*\*\*  
\*\*\*\*\*

Any Federal tax advice contained herein is not intended or written to be used, and cannot be used by you or any other person, for the purpose of avoiding any penalties that may be imposed by the Internal Revenue Code. This disclosure is made in accordance with the rules of Treasury Department Circular 230 governing standards of practice before the Internal Revenue Service. Any written statement contained herein relating to any Federal tax transaction or matter may not be used by any person without the express prior written permission in each instance of a partner of this firm to support the promotion or marketing of or to recommend any Federal tax transaction(s) or matter(s) addressed herein.

\*\*\*\*\*  
\*\*\*\*\*



# **EXHIBIT 5**

From: Rick Rollinski <expectedusa@aol.com>  
 Date: December 10, 2013 at 7:09:36 PM EST  
 To: <richard@reputationchanger.com>, <impact@directresponse.net>  
 Subject: Brand's shady practices and 2 time rapist CEO Exposed

Hi Rich

Im going to start emailing the Jakmian's, all of your clients, Hersh's companies, all of the people at Brand.com Interdigital, NewsHeadquarters, Ads Direct, and all of the other companies employees and partners links to your registered sex offender links on a regular basis. After that im going to disclose your entire network of sites used for your clients at brand.com. Im going to "leak" a full list of all of your clients and the methods you use to protect them to the media via direct mail to journalists around the world. I'll detail everything from beginning til end, specifically highlighting your most important clients and network of fake news websites. The releases will specifically target you, what you've been up to and others targeting brand.com and how brand.com works. This won't be some amateur posting 1 post on some website. This will be a coordinated campaign intelligently orchestrated to execute the goal. The goal is to make sure this costs you more than \$500,000 to justify the money we're requesting.

In short, ill ruin your personal life and your professional life until you deliver the requested coin. If you've been doing any pump and dumps, registering your sex offender home address to walgreens, not registering correct information I'd be careful If I were you, since that is the kind of thing that will land you back in prison.

I'll use SEO, content creation, user-interactions, the media, the cloud hive-mind and link building to ensure all of these things are very easy to find when searching for your name, your companies names and your wife's name. It will be overwhelming and the things you thought were buried and far away will suddenly be all around you. Ill contact all of the people that hate you, your competitors and Sparkles family and let them know what is happening and how to help amplify it. Ill also involve the great resources like Anonymous, 4chan and anyone else that might jump on the bandwagon just for the lulz.

Ill do all of these things and you can stop me. By paying \$500,000 in bitcoin. Ill stop and disappear out of your life forever. Keep in mind the origination ip address for this email is a proxy, and under it, another proxy, with no logs and a cloud of other anonymous connections. I am very good at what I do and have worked for major banks and governments off the record to destroy country and company just like Ill do with you and all of your businesses. Your interest is \$5000/day. To stop me from moving forward, make a minimum payment of \$100,000 into the account. This will stop me for 2 days before I continue.

Send bitcoins to 1CiBjtVdCJtLzqY1q4k2nZAMCLpuUo8DmT

PS: I'm going to start now by sending emails like this one to the other clients of brand.com. If I get through that list and do not have at least \$500,000 in bitcoin, I'm going to start on exposing brand.com, how it works and who the clients are. I am not bluffing. If you will not comply, I will sink your companies 1 by 1 and destroy your reputation. You won't have the resources to repair it by the time im done.

If you fight this, you will not win. It will cost you far more than \$1,000,000 and I will just move on to the next project while you pick up the pieces and try to start over again. To save you some time, your technical idiots will be able to find that this email was sent from 85.118.133.36 but that will be all.



# **EXHIBIT 6**



From: Rick Rollinski [mailto:expectedusa@aol.com]  
Sent: Thursday, December 12, 2013 6:48 PM  
To: Brand.com; impact@directresponse.net  
Subject: Yo richie

505k today buddy

You know, you just haven't given me anything to make me think you're taking this seriously. I want you to think about that.

Make a small payment in good faith. Just so I know you're paying attention and what im about to do will be the last of it while I work thorough that list of clients you boys have. Hm, I think 25k will do while you guys come up with the rest. Haha. I know you boys are going to be stubborn on this. After all you probably think you're better at this reputation shit than anybody. You're about to have a rude awakening since I know something you don't know ;)

Send bitcoins to 1CiBJtVdCJtLzqY1q4k2nZAMCLpuUo8DmT

<http://www.youtube.com/watch?v=hzExWz7KP5M>



# **EXHIBIT 7**

Friday, December 13, 2013 at 4:41:59 PM Eastern Standard Time

**Subject:** RE: Man women can talk

**Date:** Thursday, December 12, 2013 at 7:19:17 PM Eastern Standard Time

**From:** Mike Zammuto

**To:** Ryan Andrews, 'Eric Trajtenberg' (eric@chescolawfirm.com), Rich Gorman

**REDACTED**

**From:** Rick Rollinski [mailto:expectedusa@aol.com]

**Sent:** Thursday, December 12, 2013 7:15 PM

**To:** Brand.com; impact@directresponse.net

**Subject:** Man women can talk

This might be the only thing you guys talk about this holiday season over the yams and cold ham. Better make with some coin Gor my man, im sure shits gonna start looking bad in short order.





# **EXHIBIT 8**

**BLANK ROME LLP**

By: Matthew D. Lee, Pa. I.D. No. 85914,  
lee-m@blankrome.com  
By: John P. Wixted, Pa. I.D. No. 309044,  
jwixted@blankrome.com  
One Logan Square  
130 North 18th Street  
Philadelphia, Pennsylvania 19103  
(215) 569-5500

**Attorneys for Plaintiff**

Richard A. Gorman  
1101 Locust Street  
Apt. 5H  
Philadelphia, PA 19107,

Plaintiff,

v.

www.performoutsider.com  
c/o 43 Billington Cres.  
Toronto Ontario  
M3A2G8 Canada,

and

John C. Monarch  
122 Central Ave.  
Greenville, SC 29601,

and

Karl F. Steinborn  
1704 Quail Valley East  
Columbia, SC 29212-1531,

and

John Doe 1, John Doe 2, and John Doe 3,

Defendants.

COURT OF COMMON PLEAS OF  
PHILADELPHIA COUNTY – CIVIL ACTION –  
\_\_\_\_\_  
TERM, 2014  
No. \_\_\_\_\_  
NON-JURY TRIAL

**NOTICE TO DEFEND**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff.

You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION  
Lawyer Referral and Information  
Service  
1101 Market Street, 11<sup>th</sup> Floor  
Philadelphia, PA 19107  
(215) 238-1701

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.


ASOCIACION DE LICENCIADOS DE  
FILADELFIA  
Servicio De Referencia E Informacion  
Legal  
1101 Market Street, 11<sup>th</sup> Floor  
Filadelfia, PA 19107  
(215) 238-1701



**BLANK ROME LLP**

By: Matthew D. Lee, Pa. I.D. No. 85914,  
lee-m@blankrome.com  
By: John P. Wixted, Pa. I.D. No. 309044,  
jwixted@blankrome.com  
One Logan Square  
130 North 18th Street  
Philadelphia, Pennsylvania 19103  
(215) 569-5500

*You are hereby notified to plead to the  
enclosed Complaint within 20 days from  
service hereof, or a default judgment may  
be entered against you.*

  
Matthew D. Lee, Esquire  
Attorney for Plaintiff, Richard A. Gorman

**Attorneys for Plaintiff**

Richard A. Gorman  
1101 Locust Street  
Apt. 5H  
Philadelphia, PA 19107,

Plaintiff,

v.

www.performoutsider.com  
c/o 43 Billington Cres.  
Toronto Ontario  
M3A2G8 Canada,

and

John C. Monarch  
122 Central Ave.  
Greenville, SC 29601,

and

Karl F. Steinborn  
1704 Quail Valley East  
Columbia, SC 29212-1531,

and

John Doe 1, John Doe 2, and John Doe 3,

Defendants.

COURT OF COMMON PLEAS OF  
PHILADELPHIA COUNTY – CIVIL ACTION –  
\_\_\_\_\_  
TERM, 2014  
No. \_\_\_\_\_  
NON-JURY TRIAL

**VERIFIED COMPLAINT**

Plaintiff Richard A. Gorman (“Plaintiff Gorman”), by and through his undersigned attorneys, files this Verified Complaint against Defendants www.performoutsider.com (“Defendant Perform Outsider”), John C. Monarch (“Defendant Monarch”), Karl F. Steinborn (“Defendant Steinborn”), John Doe 1, John Doe 2, and John Doe 3 (collectively “Defendants”), and in support thereof avers as follows:

**I. PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff Gorman is a citizen of the Commonwealth of Pennsylvania, residing at 1101 Locust Street Apt. 5H, Philadelphia, PA 19107.

2. Upon information and belief, Defendant Perform Outsider is a website with its registered address at 43 Billington Cres. Toronto Ontario, M3A2G8 Canada.

3. Upon information and belief, Defendant Monarch is a citizen of the State of South Carolina, residing at 122 Central Ave., Greenville, SC 29601.

4. Upon information and belief, Defendant Steinborn is a citizen of the State of South Carolina, residing at 1704 Quail Valley East, Columbia, SC 29212-1531.

5. At present, the identities and places of residence of Defendants John Doe 1, John Doe 2, and John Doe 3 are unknown.

6. This Court has jurisdiction over this action pursuant to 42 Pa. C.S. § 931 and 42 Pa. C.S. § 5322.

7. Venue is proper in this County pursuant to Rule 1006(a)(1) of the Pennsylvania Rules of Civil Procedure, as upon information and belief the cause of action arose in Philadelphia County and the defamatory statements in question have been directed to Plaintiff Gorman in Philadelphia

County.

## **II. FACTUAL BACKGROUND**

8. Plaintiff Gorman and Defendants are business competitors.

9. Specifically, Plaintiff Gorman is affiliated with various companies which, among other things, are in the business of distributing consumer goods.

10. Upon information and belief, Defendant Monarch is the owner and operator of Direct Outbound Services, LLC, which is also in the business of distributing consumer goods, and does business throughout the United States.

11. Upon information and belief, Defendant Steinborn is an individual who was previously employed by the Affiliati Network, a Florida corporation in the business of affiliate marketing.

12. Defendant Perform Outsider is a website that markets and promotes companies such as Direct Outbound Services, LLC and others. The email address of the owner of www.performoutsider.com is identified as jasonstateham@gmail.com.

13. Upon information and belief, Defendants John Doe 1, John Doe 2, and John Doe 3, and others, are affiliated with Defendant Perform Outsider and are responsible for content posted on www.performoutsider.com and on other sources of internet media which use variations of the name “perform outsider.”

14. In December 2013, Plaintiff Gorman received email communications demanding that he pay money and threatening to harm him, his family, his reputation, and his prior and current business interests if he failed to do so.

15. As described more fully below, Defendants have engaged in a concerted effort to



harm Plaintiff Gorman, his reputation, and his business interests by publishing a series of false and defamatory statements about Plaintiff Gorman in a variety of online media.

**A. Defendants Have Defamed and Continue to Defame Plaintiff Gorman on Defendant Perform Outsider's Website**

16. On or about July 29, 2013, Defendant Perform Outsider published an article which contained numerous erroneous statements concerning criminal activity and Plaintiff Gorman. *See* <http://www.performoutsider.com/2013/07/29/richard-gorman-aka-directresponse-net-criminal-past/>. A true and correct copy of the July 29, 2013 performoutsider.com article is attached hereto as **Exhibit A**.

17. The article at issue was posted to the [www.performoutsider.com](http://www.performoutsider.com) website by "Admin," indicating that the information was uploaded by Defendant Perform Outsider's administrator(s) and/or agent(s), rather than a third party visitor to the website. *See Exhibit A* at 1.

18. The article falsely asserted that Plaintiff Gorman sexually assaulted a minor. *See Exhibit A* at 4 (accusing Plaintiff Gorman of rape and referring to an "underage victim").

19. The article also linked to and incorporated by reference the website <http://anonnews.org/forum/post/8233> (the "AnonNews Site"). *See id.*

20. The AnonNews Site contained posts which falsely asserted that Plaintiff Gorman was a pedophile. *See, e.g.,* AnonNews Site at 1, a true and correct copy of which is attached hereto as **Exhibit B**. The post containing the defamatory statements was removed from the AnonNews Site at some time subsequent to October 6, 2013.

21. These assertions are false and defamatory, and were made with the malicious intent of harming Plaintiff Gorman, his reputation, and his business relationships.

22. The false and defamatory statements made on Defendant Perform Outsider's website

have been and continue to be viewed by visitors to the website, who understand that such statements concern Plaintiff Gorman.

23. Upon information and belief, Defendant Monarch is affiliated with and/or has acted as agent for Defendant Perform Outsider and has participated in the dissemination of the false and defamatory statements on www.performoutsider.com.

24. Upon information and belief, Defendant Steinborn is affiliated with and/or has acted as agent for Defendant Perform Outsider and has participated in the dissemination of the false and defamatory statements on www.performoutsider.com.

25. Upon information and belief, Defendants John Doe 1, John Doe 2, John Doe 3, and possibly others, are affiliated with and/or have acted as agents for Defendant Perform Outsider and have participated in the dissemination of the false and defamatory statements on www.performoutsider.com.

**B. Defendants Have Defamed and Continue to Defame Plaintiff Gorman Via Defendant Perform Outsider's Twitter Account**

26. On information and belief, Defendant Perform Outsider maintains a Twitter account under the name “@performoutsider.”

27. When the “@performoutsider” Twitter account was recently created, its first, third, and fourth followers were individuals with Twitter accounts identified as “John Monarch @papajohn56”, “Karl @steinborn”, and “Karl Steinborn @RepGuruKarl”, respectively.

28. On information and belief, the @papajohn56 Twitter account is associated with Defendant Monarch.

29. On information and belief, the @steinborn and @RepGuruKarl Twitter accounts are associated with Defendant Steinborn.

30. Defendants have used Defendant Perform Outsider's Twitter account to defame and harass Plaintiff Gorman. A true and correct copy of the relevant posts from Defendant Perform Outsider's Twitter account are attached collectively hereto as **Exhibit C**.

31. On December 19, 2013, Defendant Perform Outsider tweeted the following false and defamatory message to an employee at a company affiliated with Plaintiff Gorman: "How does it feel working for a person who was convicted of a sexual assault on a minor?" *See Exhibit C* at 1.

32. That same day, Defendant Perform Outsider also linked to and incorporated by reference the website <http://postimg.org/image/alfc9uy1j/> (the "Post IMG Site"). *Id.* at 3.

33. The Post IMG Site falsely refers to Plaintiff Gorman as a "child molester" and falsely states that his daughter was conceived during a rape. *See* Post IMG Site at 1, 3, a true and correct copy of which is attached hereto as **Exhibit D**. The Post IMG Site also falsely states that Plaintiff Gorman maintains a Facebook account.

34. That same day, Defendant Perform Outsider re-tweeted the false and defamatory article described in section II.A above. *See Exhibit C* at 3.

35. These assertions are false and defamatory, and were made with the malicious intent of harming Plaintiff Gorman, his reputation, and his business relationships.

36. The false and defamatory statements made on Defendant Perform Outsider's Twitter feed have been and continue to be viewed by multiple third parties (including the "followers" of "@performoutsider" and others), who understand that such statements concern Plaintiff Gorman.

37. Upon information and belief, Defendant Monarch is affiliated with and/or has acted as agent for and/or on behalf of Defendant Perform Outsider and has participated in the dissemination of the false and defamatory statements via the "@performoutsider" Twitter account.



38. Upon information and belief, Defendant Steinborn is affiliated with and/or has acted as agent for and/or on behalf of Defendant Perform Outsider and has participated in the dissemination of the false and defamatory statements via the “@performoutsider” Twitter account.

39. Upon information and belief, Defendants John Doe 1, John Doe 2, John Doe 3, and others, are affiliated with and/or have acted as agents for and/or on behalf of Defendant Perform Outsider and have participated in the dissemination of the false and defamatory statements via the “@performoutsider” Twitter account.

### **COUNT I – DEFAMATION**

40. Plaintiff Gorman repeats the averments in the above paragraphs as if fully set forth herein.

41. As set forth above, intending to injure Plaintiff Gorman and to defame Plaintiff Gorman’s reputation, Defendants maliciously, deliberately, and recklessly published false and defamatory written statements concerning Plaintiff Gorman.

42. The false and defamatory statements made by Defendants were and are untrue, and were known by Defendants to be untrue and to have no basis in fact.

43. The false and defamatory statements made by Defendants were not privileged.

44. The recipients of the statements made by Defendants understood the defamatory meaning of such statements.

45. The recipients of the defamatory statements made by Defendants understood that such statements applied to Plaintiff Gorman.

46. The false and defamatory statements made by Defendants constitute defamation per se.

47. Defendants' actions were willful, wanton, and outrageous.

48. Defendants' false and defamatory statements were directed to Plaintiff Gorman in Pennsylvania.

49. Plaintiff Gorman has suffered, and will continue to suffer, substantial and irreparable harm to his reputation as a result of Defendants' defamation.

50. Defendants' defamation is a direct and proximate cause of Plaintiff Gorman's damages.

WHEREFORE, Plaintiff Gorman demands judgment in his favor and against Defendants Perform Outsider, Monarch, Steinborn, John Doe 1, John Doe 2, and John Doe 3:

- a. For actual damages in excess of \$50,000, which Plaintiff Gorman is entitled to recover as a result of Defendants' publication of defamatory statements;
- b. For incidental, consequential, and punitive damages in excess of \$50,000 as permitted by law;
- c. For a preliminary and permanent injunction compelling Defendants to refrain from making defamatory statements about Plaintiff Gorman; and

d. For all such other relief as this Court deems appropriate.

Respectfully submitted,

**BLANK ROME LLP**

Dated: January 24, 2014

By: 

MATTHEW D. LEE

JOHN P. WIXTED

Pa. ID. Nos. 85914 and 309044

One Logan Square

130 North 18th Street

Philadelphia, PA 19103-6998

Telephone No. (215) 569-5500

Fax No. (215) 569-5555

*Attorneys for Plaintiff Richard A. Gorman*



**VERIFICATION**

I, Richard A. Gorman, hereby state that I am authorized to make this Verification on behalf of Plaintiff. I verify that the statements set forth in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief. I understand that these statements are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

A handwritten signature in black ink, reading "Rich Gorman", written over a horizontal line.

Dated: January 24, 2014

# **EXHIBIT 9**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD A. GORMAN

Plaintiff,

v.

JOHN C. MONARCH,  
KARL F. STEINBORN,  
WWW.PERFORMOUTSIDER.COM  
JOHN DOE 1, JOHN DOE 2 and  
JOHN DOE 3

Defendants.

CIVIL ACTION NO. 14-0890

**DEFENDANT JOHN MONARCH'S RESPONSE TO PLAINTIFF'S MOTION  
FOR THE COURT TO ALLOW  
ALTERNATIVE SERVICE BY PUBLICATION**

Defendant John Monarch ("John"), by and through undersigned counsel, submits this Response (the "Reply") to Plaintiff's Motion for the Court to Allow Alternative Service by Publication (the "Motion"), and, for the reasons set forth below,<sup>1</sup> respectfully requests that the Motion be denied.

It appears that Plaintiff is attempting to serve the website performoutsider.com (the "Website") by publication. This is equivalent to attempting to serve a person's car that injured a plaintiff in a personal injury case. Clearly naming and attempting to serve the property that the defendant allegedly used to commit the underlying tort at issue would be improper. Additionally, this is exceptionally true when the plaintiff is aware that there is a person who

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<sup>1</sup> It should be noted that Plaintiff makes a number of untrue, irrelevant, and inappropriate comments about John in the Motion. Accordingly, John will not dignify these comments with any response because they are clearly unworthy of any substantive response.

owns the property at issue and the person used that property to allegedly commit the tortious conduct at issue.

In his Motion, Plaintiff admits that he is aware that John is not the owner of the Website, and that the Owner of the Website goes by the name Ilya Putin (“Ilya”). *See* Motion, ¶ 3 (stating that, “[b]y registering the website . . . to an incorrect address and through his Facebook communications with Defendant Monarch, it is evident that the owner of [the Website] has attempted to conceal who owns the website and make it appear as though another individual controls the website . . .”).<sup>2</sup> However, Plaintiff insists on trying to serve by publication the property owned by Ilya, which is the Website, rather than Ilya.

Even more significant, Plaintiff has issued subpoenas to Twitter, Google, and Facebook in an attempt to ascertain Ilya’s real name and contact information.<sup>3</sup> Accordingly, because the subpoenas are likely to provide Ilya’s real name and contact information, it appears that any attempt to serve Ilya by publication would be premature at this point.

WHEREFORE, based upon the foregoing, John respectfully requests that the Court enter an order denying the Motion and awarding such other and further relief as the Court finds appropriate.

RESPECTFULLY submitted this 15<sup>th</sup> day of May, 2014.

/s/ Daniel R. Warner  
Daniel R. Warner, Esq.  
Arizona Bar # 026503  
(Admitted Pro Hac Vice)  
**KELLY / WARNER, PLLC**  
8283 N. Hayden Road, Suite 229  
Scottsdale, Arizona 85258  
Tel: 480-331-9397

<sup>2</sup> Notably, even though Plaintiff is now aware that John is not the owner of the Website, he still refuses to voluntarily dismiss John from this case. It appears that Plaintiff has an obsession with John (not the other way around as Plaintiff apparently wishes).

<sup>3</sup> Unfortunately, contrary to Plaintiff’s continued belief, John does not know Ilya’s true name, and John does not have any other contact information for Ilya that has not been already provided to Plaintiff.



Fax: 1-866-961-4984  
Email: [dan@kellywarnerlaw.com](mailto:dan@kellywarnerlaw.com)

/s/ Matthew Glazer  
Matthew Glazer, Esq.  
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*Attorneys for Defendant Monarch*

**CERTIFICATE OF SERVICE**

I hereby certify that, on the same date set forth above, I electronically transmitted the foregoing document to the Clerk's Office using CM/ECF System for filing and distribution to the following registered participants of the CM/ECF System:

Matthew D. Lee, Esq.  
[Lee-m@blankrome.com](mailto:Lee-m@blankrome.com)  
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32 S. Church St.  
West Chester, PA 19382  
*Attorney for Plaintiff*

/s/ Jill Loy  
Employee of Kelly / Warner, PLLC

# **EXHIBIT 10**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**RICHARD GORMAN,**

**V.**

**JOHN C. MONARCH,  
WWW.PERFORMOUTSIDER.COM,  
KARL F. STEINBORN, JOHN DOE 1,  
JOHN DOE 2, and JOHN DOE 3.**

## CIVIL ACTION

**No.14-0890**

## ORDER

AND NOW, this 21st day of May, 2014, upon consideration of Plaintiff Richard A. Gorman's Motion for the Court to Allow Alternative Service by Publication (paper no. 18) and Defendant John Monarch's Response to Plaintiff's Motion (paper no. 19), it appearing that:

- a. Plaintiff brings a single count of defamation against three named (John C. Monarch, www.performoutsider.com, and Karl F. Steinborn) and three unnamed (John Doe Nos. 1-3) defendants. Plaintiff alleges defendants published false statements about him on the website www.performoutsider.com and other online locations.
- b. Plaintiff alleges www.performoutsider.com is a website with a registered address at Toronto, Ontario. Compl. ¶ 12. A website is not a legal entity capable of being sued. *See, e.g., Wine & Canvas Dev., LLC v. Weissner*, 886 F. Supp. 2d 930, 942 (S.D. Ind. 2012); *Righthaven LLC v. Wolf*, 813 F. Supp. 2d 1265, 1266 n.1 (D. Col. 2011). Plaintiff may maintain a suit against an owner or operator of a website.
- c. Counsel are reminded they are to refrain from unprofessional conduct, including the use of impertinent or discourteous remarks about opposing parties or counsel. Counsel are expected to refer to the parties and each other by their surnames and to otherwise abide by the Code of Civility adopted by the Pennsylvania Supreme Court and the Working Rules of Professionalism adopted by the Philadelphia Bar Association. The court may consider sanctions, including reconsideration of motions for admission *pro hac vice*, for pejorative or disrespectful behavior in connection with this action.

It is **ORDERED** that:

1. Plaintiff's Motion to Allow Alternative Service is **DENIED without prejudice**.
2. Defendant [www.performoutsider.com](http://www.performoutsider.com) is **DISMISSED without prejudice**.



3. Plaintiff is **GRANTED LEAVE** to amend his complaint to name the owner and/or operator of www.performoutsider.com. Plaintiff may file an amended complaint against the owner and/or operator of www.performoutsider.com on or before **July 21, 2014**.

*/s/ Norma L. Shapiro*

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J.

# **EXHIBIT 11**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

<b>RICHARD A. GORMAN,</b> <div style="text-align: right; padding-right: 20px;"><b>Plaintiff,</b></div>	:	<b>CIVIL ACTION</b>
	:	
<b>v.</b>	:	<b>No. 14-890</b>
	:	
<b>KARL F. STEINBORN at al.,</b> <div style="text-align: right; padding-right: 20px;"><b>Defendants.</b></div>	:	

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**MCHUGH, J.**

**MAY 20, 2015**

**MEMORANDUM**

This is an action for defamation brought by Plaintiff Richard Gorman against Karl Steinborn, among others. Gorman is affiliated with the various enterprises that are in the business of distributing consumer goods. Included among these businesses were “brand.com” and “Reputation Changer,” which sought to monitor and improve the image of individuals and businesses as they were described on the Internet. The business captured public attention when the name “brand.com” was purchased by Gorman and others for a substantial sum of money.

In the summer of 2013, Gorman’s business became the focus of Internet postings and communications on Twitter that falsely accused him of being a convicted child molester and pedophile. Another posting stated that his daughter was conceived as a result of a rape. Later that same year, Gorman received an email communication seeking to extort a substantial sum of money from him, with a threat to harm him, his family, and his current or former businesses if he refused the demand.

Gorman retained counsel and also undertook an investigation through a consulting firm, Kroll Advisory Solutions. That investigation led to the conclusion that the defendant Karl Steinborn, among others, was behind the defamation and the personal attacks.

Suit was filed in Pennsylvania state court, and removed to the Eastern District of Pennsylvania in February of 2014. A default was entered by the Clerk of Court, and on November 24, 2014, after concluding that personal jurisdiction existed over the defendant pursuant to Pennsylvania's Long-Arm statute, I entered a default judgment. A hearing on damages was conducted on April 17, 2015, at which time I admitted into evidence various documents, and heard testimony from Plaintiff and a business associate. Appropriate notice was given to Defendant Steinborn, but he did not appear.

First, separate and apart from the allegations in the complaint, I conclude that Plaintiff Richard Gorman was defamed. The allegations against him, that he was convicted of child molestation and is a proven pedophile are patently false, as is the scandalous allegation that his daughter was conceived as a result of a rape.

I am further persuaded by the evidence the Mr. Gorman has suffered damages. First, with respect to special damages, he incurred investigatory expenses of \$3,700.72, and legal fees in the total amount of \$43,907.33. Mr. Gorman further claims loss of revenue to his business, but from the evidence presented, because none of his businesses are parties to this action, I am not persuaded that I can award such damages as a matter of law.

Nonetheless, the evidence is clear that he was the target of a reprehensible campaign aimed at impugning his character with the specific purpose of harming his ability to conduct business and destroying his personal reputation. Mr. Gorman recounted in clear detail the emotional distress that he has suffered, and the lengths to which he has had to go to convince third parties that he has not committed the vile acts of which he has been accused. Of particular note, Mr. Gorman recounted how, as the scandal spread, the parents of his children's friends



began to limit social contact and undermine his family life. It is difficult for me to conceive a worse accusation against a father than that of being a pedophile.

Furthermore, although I declined to award damages for direct loss of business income, I conclude from a preponderance of the evidence that the emotional distress encountered by Mr. Gorman and the degree to which he was forced to commit his concentration and energy to salvaging his reputation, dramatically impacted his ability to pursue his normal activities—both business and personal—and completely undermined his quality of life.

I conclude from a preponderance of the evidence that, separate and apart from the special damages itemized above, Mr. Gorman is entitled to compensatory damages for his non-economic losses, including his mental anguish and emotional suffering, in the amount of \$3 million.

I further conclude that because of the widespread dissemination and pernicious nature of the defamation that occurred, Plaintiff is entitled to permanent injunctive relief designed to prevent further damage to his reputation and further threats to his safety.

An appropriate order will be entered.

/s/ Gerald Austin McHugh  
United States District Court Judge

# **EXHIBIT 12**

STATE OF SOUTH CAROLINA

COUNTY OF GREENVILLE

RICHARD A. GORMAN,

Plaintiff,

vs.

JOHN C. MONARCH, DIRECT  
OUTBOUND SERVICES, LLC, AND  
SHIPCHAIN, INC.

Defendants.

IN THE COURT OF COMMON PLEAS

Civil Action No. 2014-CP-23-04432

**DEFENDANT JOHN C. MONARCH'S  
SUPPLEMENTAL ANSWERS TO  
PLAINTIFF'S INTERROGATORIES**

TO: ANDREW S. RADEKER, ESQUIRE AND DAVID L. MOORE, JR., ESQUIRE  
ATTORNEYS FOR PLAINTIFF:

Pursuant to South Carolina Rule of Civil Procedure 33, Defendant John C. Monarch hereby supplements his responses to Plaintiff Richard A. Gorman's ("Plaintiff") Interrogatories as follows:

**GENERAL OBJECTIONS**

1. Defendant objects to Plaintiff's Interrogatories to the extent that they: (a) seek to require Defendant to provide any information or identify documents within, subject to or protected by the attorney-client privilege, work product doctrine or the protection afforded mental impressions, conclusions, opinions or legal theories of Defendant's attorneys or its representatives as defined in South Carolina Rule of Civil Procedure 26(b)(3), or other privileges; or (b) seek to impose upon Defendant any other obligation not imposed by the South Carolina Rules of Civil Procedure, specifically Rules 26 and 33.

2. Defendant objects to Plaintiff's Interrogatories to the extent they seek documents or information containing legal or factual opinions or conclusions.



3. Defendant objects to Plaintiff's Interrogatories to the extent they seek for Defendant to assume or speculate on matters not within Defendant's knowledge or observation.

4. Defendant objects to Plaintiff's Interrogatories to the extent they seek or may be deemed to seek or require the production or disclosure of information or documents created or generated after and/or as a result of this lawsuit being filed. No such documents or information will be produced or identified in a Privilege Log.

5. Defendant objects to Plaintiff's Interrogatories to the extent they seek or might be argued to have Defendant admit that the law is as described by Defendant. By answering these Interrogatories, Defendant is not admitting that the law is as described in Plaintiff's discovery requests, any discovery responses from Plaintiff, or Plaintiff's pleadings.

6. Defendant objects to Plaintiff's Interrogatories to the extent they seek to impose upon Defendant a duty to ascertain, create, or secure information that is not in Defendant's possession, custody or control.

7. To the extent Defendant responds as set forth herein, nothing in these responses should be construed as waiving rights or objections which otherwise might be available to Defendant. Furthermore, Defendant reserves and does not waive his right to object to the relevancy, authenticity, competency or admissibility of any of the information contained in these Responses to Plaintiff's Interrogatories.

8. By answering Plaintiff's Interrogatories, Defendants are not waiving any immunity or defense he or any of his employees or agents might have to the claims by Plaintiff.

9. Defendants objects to Plaintiff's Interrogatories to the extent they seek or may be deemed to seek production of materials or information not within the time period complained about in Plaintiff's pleadings.



10. Defendant reserves the right to supplement or amend his Responses to Plaintiff's Interrogatories.

11. Defendant objects to the Plaintiff's Interrogatories to the extent they seek or may be deemed to seek production of materials or discovery of information, the location, retrieval or production of which would be unduly burdensome to Defendants.

12. By responding to these Interrogatories, Defendant is not waiving any other objections to discovery, any other defense to the Complaint, or any objection to admissibility of evidence.

13. These general objections apply to all of Defendant's responses. To the extent that specific general objections are cited in a specific response, those specific citations are provided because they are believed to be particularly applicable to the specific Interrogatories and are not to be construed as a waiver of any other general objection applicable to information falling within the scope of the Interrogatories.

14. The following responses reflect Defendant's present knowledge, information and belief, and may be subject to change or modification based on Defendant's further discovery, or on facts or circumstances which may come to Defendant's knowledge during the course of discovery and/or preparation for litigation.

**PRIOR COUNSEL'S SPECIFIC OBJECTIONS TO RULE 33(b) INTERROGATORIES**

Prior Counsel for Defendant invoked a number of specific objections to Plaintiff's Rule 33(b) Interrogatories, and while Defendant does reserve the right to supplement Interrogatory responses as discovery continues, Defendant's current Counsel withdraws the specific objections previously raised by Defendant's Prior Counsel in response to Plaintiff's Rule 33(b) Interrogatories Nos. 1 through 5.

**SUPPLEMENTAL RESPONSES TO PLAINTIFF'S RULE 33(b) INTERROGATORIES**

**Interrogatory No. 1:** Give the names and addresses of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

**Response:** Defendant Monarch, supplements his Response to Plaintiff's Rule 33(b) Interrogatory No. 1 as follows: Upon information and belief, at the present time the following individuals are believed to be witnesses concerning the facts of the case:

- a. Ilya Shpetrik aka "Ilya Syanov," "Ilya Putin," "Ilya Putin (BLT)," "Ilya BLT," "Ilya S.," and "Illya S."  
33 Mogul Drive  
Toronto, Ontario M2H 2M8  
Canada  
No known written or recorded statement exists at this time.
- b. Brian McLevis
- c. Brandon Rosen
- d. Steve Howe

Defendant Monarch reserves the right to supplement this answer as discovery in this case continues.

**Interrogatory No. 2:** For each person known to the parties or counsel to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

**Response:** At this time Defendant Monarch believes that the following summaries are an accurate statement of the facts believed to be known or observed by fact witnesses regarding the allegations made and defenses raised in this case:

- a. John Monarch: John Monarch is a Defendant in this suit. Mr. Monarch will dispute the Plaintiff's allegations as stated in Plaintiff's pleadings. Mr. Monarch can also provide information regarding his lack of knowledge and/or involvement in any



alleged effort to defame or conspire against Plaintiff; Moreover, Mr. Monarch can provide information regarding him being a separate legal individual/entity from Direct Outbound Services, LLC;

- b. Ilya Shpetrik aka “Ilya Syanov,” “Ilya Putin,” “Ilya Putin (BLT),” “Ilya BLT,” “Ilya S,” and “Illya S.”: Upon information and belief, Ilya Shpetrik (“Ilya”) is Ilya Putin, Ilya Syanov, Ilya Putin (BLT), Ilya BLT, Ilya S, and Illya S. Accordingly, Defendant Monarch believes that Ilya will have information as to the fact that Defendant Monarch is not Ilya Putin or any of Ilya’s other aliases, as alleged by Plaintiff. Moreover, upon information and belief, Ilya would be able to provide information and/or testimony as to the fact that Defendant Monarch had no knowledge and/or involvement in any alleged effort to defame or conspire against Plaintiff, that Defendant Monarch did not own, operate, have control over, or publish any information through performoutsider.com, its website, or its Twitter account;
- c. Brian McLevis: Mr. McLevis works in the e-commerce and internet marketing industry and may have information concerning false allegations that 1) Mr. Monarch is Ilya, 2) Mr. Monarch owns or operates the PerformOutsider Website, and 3) that Mr. Monarch was engaged in efforts to commit online defamation and blackmail. Mr. McLevis may also have information concerning false information posted to a website previously operated by Plaintiff, [www.johncmonarch.com](http://www.johncmonarch.com), which claimed that Mr. Monarch was Ilya, that he had attempted to blackmail Mr. McLevis for bitcoin, and when Mr. McLevis did not pay the blackmail Mr. Monarch published the blackmail material causing Mr. McLevis millions of dollars in damages;

- d. Brandon Rosen: Mr. Rosen works in the e-commerce and internet marketing industry and may have information concerning false allegations that 1) Mr. Monarch is Ilya, 2) Mr. Monarch owns or operates the PerformOutsider Website, and 3) that Mr. Monarch was engaged in efforts to commit online defamation and blackmail. Mr. Rosen may also have information concerning false information posted to a website previously operated by Plaintiff, [www.johncmonarch.com](http://www.johncmonarch.com), which claimed that Mr. Monarch was Ilya and that Mr. Monarch had successfully blackmailed Mr. Rosen in exchange for bitcoin;
- e. Steve Howe: Mr. Howe works in the e-commerce and internet marketing industry and may have information concerning false allegations that 1) Mr. Monarch is Ilya, 2) Mr. Monarch owns or operates the PerformOutsider Website, and 3) that Mr. Monarch was engaged in efforts to commit online defamation and blackmail.

Defendant Monarch reserves the right to supplement this answer as discovery in this case continues.

#### **SUPPLEMENTAL RESPONSES TO PLAINTIFF'S GENERAL INTERROGATORIES**

**Interrogatory No. 2:** Identify all persons with whom you have directly communicated regarding Richard A. Gorman, Brand.com, or Reputation Changer Inc., from January 1, 2012 to the present date, including those with whom you have communicated via email, text message, or using any website application, forum, blog, imageboard, social media service, or other medium on the World Wide Web.

**Response:** Subject to and without waiving any objections previously asserted, Defendant Monarch, supplements his Response to General Interrogatory No. 2 as follows: Brian McLevis, Brandon Rosen, Steve Howe, and Mike Arias.

**Interrogatory No. 5:** Identify all persons who own, manage, or control the content displayed on the website known as "Perform Outsider" located at [www.performoutsider.com](http://www.performoutsider.com) ("PerformOutsider Website") and/or the Twitter account @performoutsider.



**Response:** Subject to and without waiving any objections previously asserted, Defendant Monarch, upon information and belief, supplements his Response to General Interrogatory No. 5 consistent with the above supplementation of Rule 33(b) Interrogatory No. 1 that provides contact information for the person believed to be Ilya Putin, Ilya Syanov, Ilya Putin (BLT), Ilya BLT, Ilya S, and/or Illya S.

**Interrogatory No. 8:** Identify all persons who own, operate or control the Facebook account bearing the name “Ilya Putin” as shown in Exhibit \_\_ attached hereto.

**Response:** Subject to and without waiving any objections previously asserted, Defendant Monarch, upon information and belief, supplements his Response to General Interrogatory No. 8 consistent with the above supplementation of Rule 33(b) Interrogatory No. 1 that provides contact information for the person believed to be Ilya Shpetrik aka Ilya Putin, Ilya Syanov, Ilya Putin (BLT), Ilya BLT, Ilya S, and/or Illya S.

**Interrogatory No. 9:** For every person identified in your answer to Interrogatories # and #8, identify all known contact information, addresses, phone numbers, nicknames, aliases, email addresses, Twitter Accounts, Facebook accounts, social media accounts, forum accounts, blog accounts, and image board accounts which belong to the person identified.

**Response:** Subject to and without waiving any objections previously asserted, Defendant Monarch, upon information and belief, supplements his Response to General Interrogatory No. 9 consistent with the above supplementation of Rule 33(b) Interrogatory No. 1 that provides contact information for the person believed to be Ilya Shpetrik aka Ilya Putin, Ilya Syanov, Ilya Putin (BLT), Ilya BLT, Ilya S, and/or Illya S.

*[SIGNATURE ON FOLLOWING PAGE]*

Respectfully submitted,

BRUMBACK & LANGLEY, LLC

s/Christopher T. Brumback

Christopher T. Brumback / S.C. Bar No. 75410

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ATTORNEYS FOR JOHN MONARCH AND  
DIRECT OUTBOUND SERVICES, INC.

July 30, 2020  
Greenville, South Carolina

STATE OF SOUTH CAROLINA )

COUNTY OF GREENVILLE )

RICHARD A. GORMAN, )

Plaintiff, )

vs. )

JOHN C. MONARCH, DIRECT )  
OUTBOUND SERVICES, LLC, AND )  
SHIPCHAIN, INC., )

Defendants. )

IN THE COURT OF COMMON PLEAS

Civil Action No. 2014-CP-23-04432

**CERTIFICATE OF SERVICE**

I certify that on this date, I have served a copy of Defendant's Supplemental Answers to Plaintiff's Interrogatories in this action on counsel of record by

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